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Bureau of Land Management

GRAZING ENVIRONMENTAL STATEMENT REVIEW REPORT

GRAZING
ENVIRONMENTAL STATEMENT
REVIEW
REPORT

Date Completed

April 30, 1979

Team Members

Jim Fox
Bill Lamb
Albert Ouchi

Marv LeNoue
Dave Sinicrope
Pete Niebauer
Bob Foster
Phil Gillespie

Bill Nothdurft

GRAZING ENVIRONMENTAL STATEMENT REVIEW REPORT
February 1979

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EXECUTIVE SUMMARY

Introduction

The grazing ES effort has forced field offices to devote a high percentage of their funds and work months to preparing grazing statements. The requirements to complete grazing ESs and the slow progress in meeting ES objectives has led to expression of concern from BLM managers, public interest groups, and Congress. Because of this concern, Director Frank Gregg established a grazing ES review group to see if the process could be streamlined to lessen demands on other programs and develop a more efficient system.

Chapter I - Background

The grazing environmental statement (ES) program is a Bureau of Land Management effort designed to bring the Bureau into compliance with all 9 subdivisions of Section 102(2) of the National Environmental Policy Act (NEPA) of 1969 which requires the filing of detailed ES's on major Federal actions significantly affecting the quality of the human environment.

BLM prepared and filed on December 31, 1974, a programmatic grazing ES for all public lands to comply with NEPA requirements. The Natural Resources Defense Council (NRDC) filed suit against BLM's grazing program asking that ES's be completed on site-specific areas to comply with NEPA's requirements. The court ruled that the programmatic ES was inadequate to meet NEPA requirements.

The original court order and agreement required BLM to prepare 212 site-specific ES's covering approximately 150 million acres of public rangelands. The 212 ES's were scheduled to be completed over a 13-year period ending on September 30, 1988.

In September 1977, BLM petitioned the court to amend the schedule. In an amended judgment of April 14, 1978, the court agreed to allow the Bureau to file eight ES's in FY 1978, and 13 in FY 1979, and required an accelerated schedule for FY's 1978-1982. The new schedule filed in accordance with the judgement now requires 145 statements to be filed by 1988.

To meet the amended court order, BLM is using the following three strategies.

1. Short-Term: This consists of completing ES's already started using allotment management plans as the proposed action.

2. Interim: The interim ES's will be based on AMP's or vegetation allocation decisions in MFP Step 2. The goal is to act as "bridge" ES's until the long-term strategy is adopted.

3. Long-Term: The "long-term" strategy (vegetation allocation) was originally designed to cover about 117 ES's by 1988 on areas where resource inventories will be updated using the newly-developed soil-vegetation inventory method (SVIM). Present projections are for about 40 statements to be prepared under this approach.

The three necessary requirements leading to the filing of a range ES are:

1. Resource Inventory: Resource and its subsequent analysis is the basis for sound land-use planning and quality ES preparation.

2. Planning: This process requires an average of 15 months from start to finish and determines the proposed actions for the grazing statements.

3. Statement Preparation: Grazing ES preapration costs for complete statements have varied from $244,000 to $607,000. The total process from inventory to filing of the final ES requires approximately 52 months.

On November 29, 1978, the Council of Environmental Quality (CEQ) published final requlations implementing the National Environmental Policy Act (NEPA). The effective date of these regulations is July 30, 1979. While the extent of change required to adapt BLM's procedures to fit the new guidelines is uncertain, it will involve considerable coordination, and detailed guidance at all levels. Bureau efforts to comply with the new CEQ regulations as well as efforts to develop Bureau Resource Management Plans (RMP's) to meet ES requirements have been initiated.

The Office of Environmental and Project Review (later changed to Office of Environmental Project Review (OEPR)), was established by Secretarial Order No. 2938, April 13, 1971, to review proposed projects. At the Bureau level, the Office of Planning, Inventory, and Environmental Coordination (PIEC) under the Deputy Director for Lands and Resources, is presently responsible for overall Bureau NEPA activities. At the State level, BLM State Directors (with the exception of Alaska) have established a formal organizational unit with planning and environmental responsibilities and all 57 Districts have organizational units with planning and environmental coordination responsibilities.

BLM contracting experience has demonstrated that the quality of deliverables, when properly administered, is potentially high. Contracting of components of an ES is an acceptable procedure and generally works well. Contracting of total ESs is limited to one experience and is not conclusive.

Chapter II - Findings and Analysis

The following areas related to Grazing ES preparation were reviewed. Findings and Analysis were grouped under each:

A. Grazing ES Schedule
B. Strategy
C. Inventory
D. Planning
E. Organization
F. Management
G. Contracting

A. Grazing ES Schedule

a. Accelerate 1979 ES Preparation. A review of the grazing statement status for those statements schedule for completion in FY 1979 indicates that problems exist in meeting the current schedule. There are four such ESs.

b. The Court Ordered Schedule is Fixed. Since the last deviation was critically recommended for disapproval by NRDC, et. al., it is not likely they would support any deviation other than acceleration.

c. CEQ Regulations for Implementing NEPA. The new CEQ regulations will impact the grazing ES process on all draft statements scheduled for publication after July 30, 1979. The new procedures could also require significant changes in ongoing ESs.

d. ES Schedule Acceleration. Inventory and planning are prerequisites to preparing quality grazing ESs. Resource inventories must be started 3½ to 4-years prior to the filing date of an ES. Since the

budget outlook for FY 1980 indicates little possibility of increases in inventory funds or supporting personnel, the current inventory schedule will be locked in through FY 1983. Land use planning should be completed two years in advance of the scheduled ES filing date to allow time for ES preparation, review, publication. Since budget increases for FY 1980 are not anticipated, increased planning efforts for 1982 and 1983 scheduled ESs will not be available.

B. Strategy

a. Vegetation (Forage) Allocation Strategy Approach. BLM has taken the position that ESs must be integrated within and contribute to the rangeland management program. An intensive inventory effort and updating of land use plans has begun to meet the tests of NEPA adequacy and contribute to the goal of achieving a sound rangeland management program.

b. Deferment of a Revised Vegetation Allocation Strategy. The current approach calls for a shift in strategy from forage allocation to vegetation allocation in FY 1981. Since RMPs are to be adopted two years later, the development of vegetation allocation approach may be more disruptive than beneficial.

c. Opportunity to Combine ES Areas. Opportunities for combining ES areas are limited in FY 1979, 1980, and 1981 because of ongoing ES efforts, planning revisions, and inventories. ESs scheduled for completion in FY 1982-1984 could be combined in some instances to reduce

the total number of ES efforts. From FY 1984-1988 the ES strategy will be interwoven with the planning process and RMPs to cover Resource Areas. Further combination may not be feasible in this period.

C. Inventory

a. Inventory Constraining Factor. Since inventory must be started 3½ to 4-years prior to the scheduled filing date of an ES, new inventory data could not be made available for those ESs scheduled for completion between 1978 and 1981. Compressing the timeframe beyond a reasonable point (48 months) will result in incomplete data, analysis, and land use decisions.

b. Inventory Inadequate for ES Preparation. Past inventory and data made available to ES teams (through the planning system) have been described as inaccurate, erroneous, outdated, or incomplete. The new soil-vegetation inventory method, (SVIM) while not a panacea, should be adequate for most planning and ES purposes.

c. Remote Sensing and ADP Technology. Using the technology that is available (Remote Sensing and ADP) will increase capability to inventory larger areas in one year and automatic calculation and storage of resource information will improve efficiency.

D. Planning

a. Planning Inadequate for ES Preparation. Land-use plans are often generalized, or fail to adequately address and resolve key issues. A major problem is simply insufficient quality control, leaving it to the ES teams

to discover (and in some cases, correct) weakness. This problem delays the ES team and requires additional time and effort.

b. Proposed Resource Management Plan Process. Proposed planning regulations were published in the Federal Register in December 1978. This will change the present planning boundaries from planning units to resource areas and incorporate the land use plans and environmental statement into one document encompassing the same area. If the RMP does not meet the court ordered requirement, it could require a supplemental ES that would add at least one more year to the four year timeframe from the start of inventory to filing the final ES.

c. Efficiency Provided by Automated Data Processing. The Bureau is in the process of providing an automated information system through the Strategic Plan. This plan will provide BLM with a tool to more effectively and rapidly retrieve and display information for decisionmaking. It will also assist in analyzing and comparing data in dimensions that will greatly improve resource management.

E. Organization

a. Organizational Changes Will Require Coordination of Responsibilities. Given adequate staffing, the proposed reorganization of the WO will result in a sound organizational structure to manage the resource ES program. Adverse impacts can be expected to be manifested during FY 1979 unless prompt, detailed identification of functional responsibilities are clearly assigned to organizational units with the responsibility.

b. Present Review Procedures Require Excessive Time and Create Contradictory Guidance. The review process was identified as the single most redundant and frustrating phase of their ES experience. The obvious "layering" of review levels is viewed by the ES team members as duplicative, sometimes contradictory and the single most obvious procedure responsible for ES schedule delays.

c. The Range ES Program Is Not Incorporated Into Bureau Programs. The ES team effort is structurally, and often physically, organized outside the operational flow of other Bureau programs at the District and State levels. This organization identification, while a necessary and valid form of project management, tends to accentuate the perception voiced by two out of three ES team participants that their range ES efforts were not really a part of the Bureau's ongoing program.

d. Organizational Structure of ES Teams Were Not Significant Factors In Team Efficiency or Morale. There are specific advantages and disadvantages to ES Team organizational units at the State and District levels. Most States have opted to structure their ES teams at the District levels for technical and management reasons. A majority, 52 percent of ES team participants, felt that the establishment of a permanent local "core team" was the preferable alternative to contracting, *ad hoc* or State level teams. There was, however, no significant difference in team morale among different types of organizational units.

F. Management

a. ES Team Participants' Perception of Lack of Commitment and Guidance. Comments provided by those responding to the questionnaire indicate that printed documents and written guidance are counterproductive. Yet, field ES participants have asked for "detailed guidance or a boilerplate ES." In general, there were repeated criticisms of management style, management commitment, management understanding, and the feeling that management was "product oriented" while the field professionals were primarily concerned with the "integrity and professional quality" of their input.

b. The Tracking System Is Not Sufficiently Comprehensive. The review team does not know exactly what the current progress is; whether the BLM-wide inventory program is on schedule for FY 1979; whether FY 1981 statements will have adequate inventory data and whether planning is proceeding on schedule. While some States and Districts are controlling the process adequately, overall it is clear that program management must more clearly define a focal point to insure that this is done. Explicit priorities must be set regarding "high priority" programs, if all are "high" then none is high.

c. The Range ES Program Is Suffering Serious Morale Problems. Based on 215 questionnaire responses from ES team participants; 1.9 percent described their ES experience as greatly satisfying, 17.2 percent as usually satisfying, 21.9 percent as O.K., 42.8 percent as sometimes

frustrating, and 16.3 percent as totally frustrating. Detailed written comments submitted by respondents were mostly critical; a few accusatory and a few identified personal benefits or improvement potential for resource management.

G. Contracting

a. Requirements of OMB Circular A-76. The OMB A-76 definition of what constitutes a "commercial or industrial activity," and whether the court-ordered range ESs are within its scope is not clear. The Range ES Review Team suggests that the Bureau not defer on this issue but embark on a contracting effort until implementing instructions are issued by the Department.

b. Quality End Products Can Be Achieved. Experience on other energy-related ESs as well as the Cerbat-Black Mountain job has demonstrated that contractors can prepare, when properly monitored, environmental analyses which are equal in quality to inhouse efforts. The quality of the deliverables under a contract that is properly administered is potentially quite high.

c. Contracts Can Reduce BLM Personnel Needs. Contracting should reduce the impact of preparing ESs on BLM technical resources. Precise preprocurement planning, complete statements of work, and intensive contract administration are essential to successful contracting. BLM's professional resource management people are generally not trained in

contract management. If extensive contracting is employed, we must devise ways to maximize and benefit from the experience gained through previous contracts.

d. Contracting Can Be Implemented in FY 1980 for FY 1981 ESs. Because of timing requirements, contracting is not possible for FY 1979 statements, or practical for those statements due in 1980 with teams now formed. Contracting for FY 1981-1983 statements is a valid option. If the Bureau is to implement the use of contracts to any significant degree, planning and development must start now to train and assist the necessary people, identify funding and required internal support (both technical and procurement).

e. Contracting Would Alleviate Many Problems. Contractor teams are responsive and capable of meeting tight deadlines. This responsiveness is due to the contractor's ability to quickly assemble or move personnel of high quality without regard to personnel ceilings or procedures, to acquire space and equipment, etc.

f. Contracts for Multiple Components Are Too Complex. The most efficient approach is a total contract, because it places total responsibility for execution, coordination and correlation on one contractor. Multiple contracts for individual components should not be used because of the additional expense and complexity of administration.

Chapter III

Conclusions and Recommendations

SCHEDULE

Conclusions: Accelerating grazing ES schedule feasible starting with 1985 scheduled ESs. Cetain FY 1979 ESs may not meet the September 30 filing date unless immediate actions are taken to speed up preparation.

Recommendations:

- Immediate steps be taken to ensure that the 1979 schedule is met.
- Negotiate with CEQ for preparing certain ESs under old guidelines.
- The grazing ES schedule not be accelerated until 1985.

STRATEGY

Conclusions: Continue with the current forage (vegetation) allocation strategy until change to RMP is implemented.

Recommendations:

- Continue to use current vegetation allocation procedure through 1983.
- ESs on total land use plans be deferred until RMP process begins.
- Explore possibilities of consolidating ES areas

INVENTORY

Conclusions: Improve preinventory planning to meet CEQ scoping needs and integration of technological advances necessary.

Recommendations:

- Preinventory plans consider ES analysis needs and implementation actions.
- Remote sensing be used to gather resource data.
- Inventory data be automated at the earliest possible date.

PLANNING

Conclusions: Quality control procedures and use of ADP needed.

Recommendations:

- State Offices improve planning control procedures.
- Grazing ES schedules and RMP Schedules be coordinated.
- Planning data be automated at the earliest possible date.

ORGANIZATION

Conclusions: Quality review responsibilities may slip with W.O. reorganization, but ES review levels and team isolation of primary concern.

Recommendations:

- Establish a coordination team to oversee W.O. reorganization transition and new CEQ regulations implementation.
- Establish a concurrent ES review process.
- Accelerate delegation of ES approval authority to the State Directors.

MANAGEMENT

Conclusions: Morale problem critical. Team participants perceive the program as lacking in commitment, guidance, and career benefits.

Recommendations:

- Place the ES program in a hiearchy of priorities, issue clear guidance, conduct periodic ES program evaluations.
- Take steps to ensure that all ES teams receive training in early stages of ES preparation.
- Expand the "Operational Planning System" to meet ES tracking needs.
- Conduct ES workshops/conferences starting in calendar year 1979.

CONTRACTING

Conclusions: Continued use and acceleration of component and full Contracts will be necessary. Procedural problems need to be worked out.

Recommendations:

- Determine applicability of OMB Circular A-76.
- Do not attempt to contract for multiple components for a single ES.
- Accelerate grazing ES contracting starting with 1981 scheduled statements.
- Develop a centralized ES contracting assistance staff.

Chapter IV

Implementation

Recommendations are deployed according to immediate or subsequent action, sequence of actions required, responsible official and target date for each action.

Chapter V

Appendix

Supporting schedules, data and summary of questionnaire responses.

Introduction

In 1973, the Natural Resource Defense Council (NRDC), filed suit against the Department of the Interior for failing to prepare grazing environmental statements (ES) on grazing management decisions in compliance with the National Environmental Policy Act (NEPA). The court ruled in favor of NRDC, and an order was issued to BLM to prepare statements on an agreed schedule. Because of the uncertainty as to how these ES's were to be prepared and the resource information necessary, the initial schedule was not met. BLM requested the court to consent to a revised schedule that projected a reduced number of completed ES's be required during the earlier years of the 13-year schedule, with an increase during the final years. The court did not accept this approach, but issued an amended order that modified the schedule slightly for 1978 and 1979.

The entire grazing ES effort has forced field offices to devote a high percentage of their funds and work months to preparing grazing statements. The requirements to complete grazing ES's and the slow progress in meeting ES objectives has expressions of caused concern from BLM managers, public interest groups, and Congress. Because of this concern, Director Frank Gregg established a grazing ES review group to see if the process could be streamlined to lessen demands on other programs and develop a more efficient system. To accomplish this review, the group conducted interviews, developed a questionnaire to be answered by field ES team members, reviewed past, and present field instructions, guidelines, special ES

Chapter I

Background

A. National Environmental Policy Act

The grazing environmental statement (ES) program is a Bureau of Land Management effort designed to bring the Bureau into compliance with Section 102(2)(c) of the National Environmental Policy Act (NEPA) of 1969 which requires the filing of detailed ES's on major Federal actions significantly affecting the quality of the human environment.

B. Programmatic Grazing Environmental Statement

BLM prepared and filed on December 31, 1974, a programmatic grazing ES for all public lands to comply with NEPA requirements. Prior to its filing date, the Natural Resources Defense Council (NRDC) filed suit against BLM's grazing program asking that ES's be completed on site-specific areas to comply with NEPA's requirements. The court ruled that the programmatic ES was inadequate to meet NEPA requirements.

C. NRDC vs. Morton

The controlling factor of the grazing ES program is the Court Judgment of December 1974, ordering BLM to prepare grazing statements for all public lands under the jurisdiction of the Bureau.

The original court order and agreement required BLM to prepare 212 site-specific ES's covering approximately 150 million acres of public rangelands. The "proposed action" of the ES's was BLM's proposed implementation of intensive management plans (AMP's). The 212 ES's were scheduled to be completed over a 13-year period ending on September 30, 1988.

The record of BLM's compliance with the terms of the court order to date is as follows: for FY 76 the BLM was to have prepared 2 ES's (San Luis and Challis) in FY 76, 9 ES's in FY 1977, and 16 ES's in FY 1979. BLM did not complete any ES's in FY 1976, and in FY 1977, filed only the Challis ES, which was considered inadequate. A supplemental ES was scheduled to be filed at a later date.

Problems in complying with the original order were based on a lack of basic resource data, especially on vegetative productivity, soils, and wildlife.

D. Amended Court Order

In September 1977, BLM petitioned the court to amend the schedule. In an amended judgment of April 14, 1978, the court chided BLM for allowing the public lands to deteriorate while failing to meet all court ordered deadlines; however, it agreed to allow the Bureau to file 8 ES's in FY 1978, and 13 in FY 1979, and required an accelerated schedule for FY's 1980-82. The new schedule filed in accordance with the judgment now requires 145 statements to be filed by 1988.

The court order specified:

> "Each ES contemplated by this Order shall discuss in detail livestock grazing activities and all reasonable alternatives thereto. Livestock grazing activities as used in this Order shall mean all existing or proposed livestock grazing, all grazing authorizations issued or contemplated to be issued by the BLM as well as those substantial activities which are supportive of and related to livestock grazing administered by the BLM, such as fencing, livestock water development, spraying, chaining, seeding, and brush removal....."

E. Strategy

To meet the amended court order, BLM is using the following three strategies. Appendix #1 charts scheduled ES's.

1. Short-Term: This consists of completing ES's already started using allotment management plans as the proposed action. Eleven ES's will fit this category and are to be completed by the end of FY 1979.

2. Interim: The interim ES's will be based on AMP's or forage allocation decisions in MFP Step 2. The goal is to act as "bridge" ES's until the long-term strategy is adopted. These ES areas were required to have first generation MFP completed and were based on existing resource data. No new inventory data were to be gathered. ES will fit this category and are to be completed by the end of the fiscal year.

3. Long-Term: This term is misleading, since the new planning regulations make resource management plans (RMP's) the strategy to be adopted by FY 1984. The "long-term" strategy was originally designed to cover about 117 ES's by 1988 on areas where resource inventories will be updated using the newly-developed soil-vegetation inventory method (SVIM) to provide support and substantiation for allocation of the vegetation resource in land-use plans (MFP Step 2 planning decisions) between livestock, wildlife, wild horses and burros, water, and visual resources. Present projections are for about 40 statements to be prepared under this approach.

Resource Management Plan (RMP Strategy): This is the new "long-term" strategy and would be used from FY 1984 to 1988 for about 57 statements. The RMP strategy is a completely new approach to the Bureau's planning system. It combines the land-use plan and ES in essentially one document for an entire resource area.

F. Schedule

The amended court order of April 14, 1978, did not specify a schedule except in terms of acreage. BLM's schedule filed with the court, however, specified ES areas by name, State, acreage, and year of completion through FY 1982. A definite schedule for FY's 83-88, however, has not been filed with the court. The court ordered that acreages covered by an ES shall be completed at a yearly rate of not less than 14 percent of the remaining total. BLM's schedule to meet this order is:

FY	Acres (000's)	Number of ES's
1978	7,198	9
1979	13,499	13
1980	29,040	16
1981	23,695	17
1982	22,370	17
1983	17,805	16
1984	17,801	16
1985	15,255	14
1986	16,758	12
1987	3,397	7
1988	7,093	8

(For a complete schedule, see Appendix #2.)

G. ES Preparation Process

Currently, ES preparation time (team assembled until the statement has been filed) ranges between 20 and 28 months. Efficiencies in the review process should reduce those statements scheduled for FY 1980 to an average of 18 to 24 months. The new planning procedures scheduled for implementation in 1983 may again increase the preparation time, since both the land use plan and ES will be prepared as one document.

Two major requirements must precede an ES. The area must have adequate inventory data and a completed land-use plan before the ES can be written. These three processes have been coordinated to meet the April 14, 1978, amended court order. (See Appendix #3 for charted time frame.)

The total process from inventory to filing of the final ES requires approximately 52 months.

The three necessary requirements leading to the filing of a range ES are:

1. Resource Inventory: Resource inventory and its subsequent analysis is the basis for sound land-use planning and quality ES preparation. In 1978, inventory costs for all involved program areas were 56 percent of the total grazing ES costs for inventory, planning, and ES preparation. At present funding levels, this will increase to 70 percent in FY 1979 and 1980. Inventory is started 3 1/2 to 4 years in advance of the scheduled ES completion date so data can be gathered in two field seasons.

2. Planning: Land use analysis and planning makes up 34 percent of the total grazing ES costs. This process requires an average of 15 months from start to finish and determines the proposed actions for the grazing

statements. Since grazing ES's are scheduled by court order, planning is scheduled to meet that order. Currently, 85 percent of BLM's total planning capability is to support the grazing ES schedule. This will increase in FY 1980 to approximately 95 percent.

3. Statement Preparation: Preparation of the grazing ES's makes up 10 percent of the total inventory, planning, and ES preparation costs associated with grazing statements.

Grazing ES preparation costs for complete statements have varied from $244,000 to $607,000. The following chart shows the total ES cost, acres, and cost per acre for nine complete ES's.

GRAZING ES COSTS
(compiled from special cost study in answer to a request from the Public Lands Council)

Name of ES	(000) ES Acres	(000) ES Cost	Cost Per Acre
San Simon	$1,347	$ 321	$0.24
Cerbat-Black Mountain	1,200	607	0.51
Tuledad-Home Camp	641	276	0.43
San Luis	516	244	0.47
Uncompahgre	526	320	0.61
Rio Puerco	393	435	1.11
Hot Desert	530	286	0.54
Sandy	1,714	570	0.33
Challis	330	457	1.38
Total	$7,197	$3,516	$0.62 av.

A variety of skills are used in preparing the grazing statements. These skills as a percentage of the work-month charges as compared to the total effort are as follows:

Summary of ES Work-Month Charges by
Position Title FY 1978

Position Title	Percent of Total
Outdoor Recreation Planner	3.1
Economist	4.3
Archeologist	4.0
General Clerical-Administration	12.0
Clerk Typist	1.4
Program Management	3.5
Natural Resource Specialist	14.0
Botanist	1.5
Range Conservationist	20.3
Range Technician	1.4
Soil Scientist	3.4
Fishery Biologist	1.4
Wildlife Biologist	5.8
Writing and Editing	5.8
Hydrologist	1.7
Geologist	1.5
Cartographic Technician	3.4
Miscellaneous Occupations	11.5
Total	100.0

H. Program Impacts

It is clear that at the District level the ES program has a substantial impact on BLM operations. The following table shows that even on a Bureauwide basis, the program's impact is a significant portion of the total program costs and work-month expenditures:

GRAZING ES PROGRAM IMPACTS FY 1978

	Inventory and ES Preparation	
	Percent of Program	
	Costs	Percent of Total Work-Months Expended
Range (Grazing)	37	46
Soil, Water, and Air	41	35
Wildlife Habitat	29	32

The impact of the range ES program on field operations is substantial. However, quantifying District level impacts caused by the ES program is quite difficult. The fact that ES's drive the planning is apparent. Recent general management evaluations in Idaho, Utah, Arizona, have repeatedly elicited questions such as; "Do we sacrifice on-the-ground management to accomplish this monumental task?; or expressed concerns that, personnel ceilings, both permanent and temporary, lack of funding and logistics, makes completion of this large acreage seem unsurmountable; or described the majority of the District personnel and program emphasis as being devoted to the preparation of the grazing ES."

I. Contracting

BLM has used contracting as one approach to gather inventory data, make studies, provide skills lacking in BLM, prepare major ES components, and prepare total ES's. To date, the major use of contracted ES's has been Cerbat-Black Mountain (AZ), Superior Oil Shale (CO), OSO Geothermal ES (CA), SOHIO Pipeline ES (five major components contracted), and McGregor Range ES (NM) (now in the process of being awarded).

The use of contracts has been of mixed value in the range ES program. The Cerbat-Black Mountain ES produced an adequate document that met its schedule. However, costs were higher than average. It may be that the same work-month (WM) investment that was required to oversee the preparation of the contract statement, would have sufficed to write an inhouse ES. The ES team leader estimates that if it were to be done again, the costs could be cut by at least 20 percent and the W/M's of BLM supervision could be cut 50 percent.

OMB Circular A-76 requires an analysis of commercial/industrial activities with an annual operating cost of $100,000 or more. This requirement could have a direct effect on ES in-house preparation. The revised guidelines provide that bids or proposals include overhead and other indirect costs to government for retirement and health benefits when determining contract or in-house preparation.

J. Council of Environmental Quality Regulations

On November 29, 1978, the Council of Environmental Quality (CEQ) published final regulations implementing the National Environmental Policy Act (NEPA). The effective date of these regulations is July 30, 1979. Therefore, any statement that is filed in draft prior to this date does not have to comply with these regulations.

The extent of change required to adapt BLM's procedures to fit the new guidelines is uncertain, since it depends on a Departmental interpretation of the intent of CEQ in key areas. At this time, however, BLM procedures appear to be quite close to meeting both the letter and spirit of the CEQ regulations. By adjusting the format, restricting analysis to truly significant impacts, increasing the analysis of alternatives to equal that of the proposed action, and requiring the inclusion of such items as a list of preparers and index, BLM should be in substantial compliance. This will involve considerable coordination, and detailed guidance at all levels.

K. ADP - Remote Sensing

The Applications System Verification and Transfer (ASVT) is a three year field test of remote sensing technology and its support of the inventory effort. The test will be complete in FY 1979. Results are promising and the technology has potential for immediate implementation.

Preliminary type maps for inventory support can be provided by the Interactive Image Analysis and Processing methdology. This converts satellite data and related aerial photography into useful products that can be used in SVIM. Denver Service Center is preparing an inhouse capability to process imagery for about 8 million acres per year.

Computer processing is vital to make practical use of the large quantity of information being collected. The capability to provide ADP support should be available by summer 1979.

Together, these approaches offer the potential to expedite the inventory program with significant manpower savings.

L. ES Organizational Structure

Neither NEPA nor CEQ have specified how an agency should be organized to comply with the Act. All reference to designation of a "responsible official" in the Act has been defined by Department of the Interior to be the Bureau Director or his designee who is responsible for a decision on a Federal action.

At the Department level, the Office of Environmental and Project Review (later changed to Office of Environmental Project Review (OEPR)), was established by Secretarial Order No. 2938, April 13, 1971:

> ".... to review proposed projects of the Department and of other agencies in order to determine whether they are formulated in accordance with applicable evaluation procedures and whether they represent the full and balanced interests of the Department in the management of natural resources and the protection of the environment...."

At the Bureau level, the Office of Planning, Inventory, and Environmental Coordination (PIEC) under the Deputy Director for Lands and Resources, is presently responsible for overall Bureau NEPA activities. In addition, Environmental Assistance staff was created to improve the NEPA process and resolve problems identified in earlier Departmental and BLM studies. (This staff was subsequently changed to the Division of Environmental Assistance.) The Division was to be the focal point for ES quality control and review, and provide advice and guidance for other NEPA activities (except OCS); however, this division is now abolished.

At the state level, BLM State Directors (with the exception of Alaska) have, as specified in the criteria, established a formal organizational unit with planning and environmental responsibilities. In six States (Colorado, Idaho, Montana, Nevada, Utah, Wyoming), a Division of Planning and Environmental Coordination (or Environmental and Planning Coordination) has been established, with separate branches or sections for planning coordination and environmental coordination. Four States have a staff organization reporting to the State Director: two, California and New Mexico, have a separate section for environmental coordination within the staff structure; one, Oregon, has two sections, planning section and environmental; and one, Arizona, has a staff but no formal break-out between planning and environment.

The Districts also have organizational units with planning and environmental coordination responsibilities. A June 1978 study of the BLM Planning Coordination Organization found that all 57 Districts had identified one or more employees with full-time planning and environmental coordinating responsiblities. The study found that in those instances where one employee had both planning and environmental coordination responsibilities, there was a measurable record of spending more time on environmental matters than on planning. Instruction Memorandum No. 79-82 dated November 7, 1978, directed all Districts to establish a full-time position for planning with the planning coordinator reporting to the District Manager. Implementation of this Instruction Memorandum will provide BLM Districts with full-time coordinators for both environmental and planning responsibilities.

Reorganization of the Washington Headquarters office has/will place NEPA responsibilities in the Office of Planning, Inventory and Environmental Coordination under the Deputy Director for Lands and Resources. This office has responsibilities for program direction and procedures for the Bureau planning system, for incorporation of the planning system into Bureau management systems and decision processes, and for the integration of environmental policies into the Bureau planning system. This office develops and maintains a comprehensive Bureauwide resource inventory strategy and plan to support planning, environmental assessment, and resource program actions as well as serving as the Bureau focal point for all NEPA matters.

Chapter II

Findings and Analysis

A. Grazing ES Schedule

1. Findings

a. Not all of the grazing ES's scheduled for completion in 1979 will be filed by September 30 unless immediate action is taken to accelerate preparation.

b. The court ordered schedule is relatively fixed with only minor deviations allowed without permission from the court.

c. The new Council of Environmental Quality regulations will result in changes to existing ES procedures that could cause delays in meeting the court ordered schedule.

d. Accelerating the schedule before 1985 will result in lower quality ES's and confusion in preparation.

2. Analysis

a. Accelerate 1979 ES Preparation. A review of the grazing statement status for those statements scheduled for completion in FY 1979 indicates that problems exist in meeting the current schedule.

Status of FY 1979 Range ES's

FES Filed With CEQ	DES Approved On Schedule	DES Not Approved-Problem	DES Not Approved-Serious Problem
7 Lakes (WY.)	Vermillion (AZ.)	Drewsey (OR.)	Caliente (NV.)
	Grand Junction (CO.)	Shoshone (ID.)	Parker Mt. (UT.)
	Missouri Breaks (MT.)	Little Lost	Randolph (UT.)
	E. Socorro (N.M.)	Birch Creek (ID.)	Three Corners (UT.)
		E. Roswell (N.M.)	

Based on past experience, any draft ES that has not been approved for printing before the 5th of April, has had difficulty in meeting the filing deadline of the 30th of September. The ES's shown in Column 3 of the status table are not anticipated to have approval to print the DES before mid April to early June. Because of this fact, tight scheduling will have to be implemented to ensure that the filing schedule is met. The four ES's shown in Column 4 of the status table may not have approval to print the DES before early June to late September. Because of this status, it is imperative that an all-out effort be directed toward the preparation of these statements to accelerate anticipated interim schedules in order to meet the filing date. The four ES's having serious problems make up 4 million acres of the total 13.5 million required for completion in FY 1979. Since the court considers this many acres more than a minor or immaterial deviation, a notice of proposed deviation would have to be filed with the court in the event these ES's are not filed as scheduled.

Slippage in ES schedules has occurred since the Challis ES was started in 1976. Since slippage in one year could have an effect on our yearly schedule requirements, efficiencies must be incorporated immediately to ensure that the current ES schedule is met.

b. The Court Ordered Schedule is Fixed. The amended court order of April 14, 1978, specifically identifies those ES's to be completed in 1978 through 1982 and requires no less than 14 percent of the remaining acres to be completed each year from 1983 through 1988.

Court Ordered Grazing ES Schedule

Fiscal Year	Number of ES's	Thousands of Acres
1978	9	7,197
1979	13	13,499
1980	16	28,898
1981	17	23,072
1982	17	19,773
1983	--	10,797
1984	--	10,797
1985	--	10,797
1986	--	10,797
1987	--	10,797
1988	--	10,797

Minor deviation, defined by the court is a reduction of less than 10 million acres or three ES's cumulatively from FY 1978 through 1982, but not more than 2 million acres or one ES in any 1 year. This deviation may be allowed at the discretion of BLM with consent of the plaintiffs. A deviation that does not meet this criteria must be filed with the court specifying the details for the deviation. Since the last deviation was critically recommended for disapproval by NRDC, et. al., it is not likely that they would support any deviation other than acceleration.

c. CEQ Regulations for Implementing NEPA. To establish uniform procedures for implementing the National Environmental Policy Act, CEQ published final regulations that become effective on July 30, 1979. The regulations are directed at accomplishing three principle aims: reduce paperwork, reduce delays, and produce better decisions. Since the regulations

will have an impact on our current ES procedures, a task force has been established to determine these impacts. The team will prepare a draft BLM guidance for interpreting and implementing CEQ regulations to be published in the Federal Register by April 1, 1979.

The new regulations will impact the grazing ES process on all draft statements scheduled for publication after July 30, 1979. Currently, four to six grazing ES's scheduled for completion in FY 1979 could fall into this category. The regulations do provide a means to continue ongoing statements that will have drafts filed after July 30 through the language "These regulations shall apply to the fullest extent practicable to ongoing activities and environmental documents begun before the effective date."

Since ES drafts filed after July 30, 1979, will have to meet the new procedures, the necessary time is not available to firm up final BLM guidelines and prepare ES's to meet the court ordered schedule. The new procedures could also result in significant changes to ongoing ES's where invested time and money would be lost.

d. ES Schedule Acceleration. Inventory and planning are prerequisites to preparing quality grazing ES's, and have a constraining effect on current and long range schedules. ES preparation itself impacts schedules because of it's effect on planning work-months and funds. Management implementation does not have a direct effect on the ES schedule, but does impact the efficient use of work-months for activity planning and development.

Resource inventories must be started 3 1/2 to 4 years prior to the

filing date of an ES. Therefore, once the inventory has been initiated on a specific area, changing the schedule or size of the area may require increased inventory funds or extending the ES filing date. Since the budget outlook for FY 1980 indicates little possibility of increases in inventory funds or supporting personnel, the current schedule will be locked in through FY 1983. Budget outlook for FY 1981 is directed toward implementation where ES's have been completed, which will result in no increased inventory funding for ES areas scheduled through FY 1984.

Land use planning should be completed two years in advance of the scheduled ES filing date to allow time for ES preparation, review, and publication. Those planning areas initiated in 1979 lock in the ES schedule for 1981 and 1982. Since budget increases for FY 1980 and 1981 are not anticipated, increased planning efforts for 1982 and 1983 scheduled ES's will not be available. Planning procedures under the resource management plan (RMP) concept is scheduled to start in 1980 as a prototype for completion in 1981. This begins the analysis for smoothing out the procedures and eliminating problem areas that may surface during integration of the planning and ES process. The first RMP is not scheduled to start until 1983 with completion scheduled for FY 1984. Accelerating the planning schedule during this transition period may result in development of new procedural problems that could reduce quality and lengthen planning preparation time.

Since budget increases for ES preparation in FY 1980 and 1981 are not expected, acceleration from a budget standpoint could not start until FY 1982. The primary concern, however, is the effects that the new CEQ regulations and planning procedures will have on an accelerated ES schedule.

To accelerate the ES schedule, both planning and NEPA requirements should be firmly understood and procedural directions should be developed. As of August 1979,the new CEQ regulations will change preparation procedures. At least one year of experience should be allowed to iron out problems and develop sound procedures. The new planning regulations will again change procedures for ES's that are begun in FY 1983 for completion in 1984; therefore, ES acceleration should not begin until experience has been gained to see if the RMP process will meet the courts requirements for grazing ES's.

Funding authorizations for rangeland improvement will provide for a 3-year on-the-ground implementation plan for the current ES schedule through FY 1982. Presently, grazing ES's are being completed faster than implementation funds are increasing. This trend may change in FY 1980, however, full authorization in one year could present problems for an effective and efficient use of funds requiring two years to build up for appropriate funding use. Therefore, if the ES schedule was accelerated before FY 1982 it would require slipping the implementation schedule beyond three years or leaving activity plans on the shelf until funds become available. Because of contraints imposed by inventory, planning, and ES preparation, ES should not be started before 1985. Between 1985 and 1988, 42.5 million acres need to be covered by grazing ES's under the current schedule. Since BLM will have already completed ES's on 29 million acres in one year, it is possible that the 42.5 million acres could be completed in 2 years. This would complete all grazing ES by FY 1986 and accelerate the schedule by two years.

B. Strategy

1. Findings

a. The current forage allocation strategy is a valid approach and, despite criticism by the court and NRDC, BLM's insistence that decisions be based on adequate inventories and land use plans is fundamentally sound and in the best long-term interests of proper rangeland management.

b. Efficiency in ES preparation would be significantly enhanced by deferring the requirement to adopt a vegetation allocation strategy.

c. There appears to be an opportunity to combine some ES areas into larger units in FY 1982, and beyond, and increase the Bureau's efficiency in ES preparation.

2. Analysis

a. Vegetation (Forage) Allocation Strategy Approach

The current court ordered schedule does not specify the approach that BLM will employ in preparing the required range ES's. BLM can, and has, changed the basic approach used in preparing these documents. BLM has taken the position that ES's must be integrated within and contribute to the rangeland management program. To do this, an intensive inventory effort and updating of land use plans has begun.

The court's amended order was not sympathetic to BLM's position that inventory data is needed. Since these inventories are an integral part of current strategies, the court's finding is an indirect criticism of these strategies. The court said the "interference" in BLM's planned inventory - planning - ES process ". . . must be balanced against the

need for BLM to act quickly to abate the deterioration of the rangeland." The court also found: "As to the data deficiency issue, it is not clear that addtional time is necessary for the collection of resource information. Plaintiffs pursuasively suggest that effective ES's can be prepared based on existing data and to the extent necessary, additional data can be collected and the statements prepared in less time than requested by the BLM." There is temptation to interpret the court language to embark on a "minimum" E.S. effort.

BLM, however, does not have the luxury of treating grazing problems in isolation. As a multiple-use agency, grazing decisions must be set in a framework of an area-wide plan of management of all resources. Additionally, the new CEQ regulations require that agencies obtain all required information to analyze environmental impacts unless the cost is "exorbitant". For these reasons, the "minimum effort" ES is not a responsible alternative.

The current forage allocation approach is designed to apportion available forage among consumptive uses of the rangelands and, when based on adequate inventory and planning data, will meet the tests of NEPA adequacy and contribute to the goal of achieving a sound rangeland management program.

b. Deferment of a Revised Vegetation Allocation Strategy

The current approach calls for a shift in strategy from forage allocation to vegetation allocation. This was originally scheduled to take place in FY 1981. Unfortunately, the detailed guidance on how to

allocate vegetation is not yet available. To prepare such ES's in FY 1981, the land use plans should begin this fiscal year and inventories (SVIM and others) must be completed by this summer. Without explicit planning guidance soon, it seems that a FY 1982 implementation should be more reasonable. Furthermore, with only 2 years (FY 1982 and 1983) in which vegetation allocation will be used before RMP's are adopted, the development of vegetation allocation approach may be more disruptive than beneficial.

An approach with significant advantage would be to defer vegetation allocation until FY 1984. This will allow immediate attention to be placed on implementing CEQ guidelines, give more time to prepare procedures for vegetation allocation, and eliminate the confusion and loss of efficiency caused by still another shift in basic strategy.

c. Opportunity to Combine ES Areas

A cursory examination of ES areas scheduled for completion by FY 1988 reveals several small ES areas, especially in California and Idaho. Opportunities for combining ES areas are limited in FY 1979, 1980 and 1981 because of on-going ES efforts, planning revisions, and inventories. ES's to be completed in FY 1982-1984 could be combined in some instances to reduce the total number of ES efforts. From FY 1984-1988 the ES strategy will be interwoven with the planning process and RMP's to cover Resource Areas. This will probably create a major adjustment and further combination may not be feasible in this period.

During preparation of the ES schedule filed with the court in September 1978, exhaustive analyses were conducted and 212 ES areas were consolidated into 145. A thorough analysis of the submission and the current situation may reveal additional opportunities for further consolidation.

C. Inventory

1. Findings

a. Under current strategy, resource inventory is the primary constraint affecting the Range ES schedule.

b. Inventory data made available to ES teams were inadequate in some cases for ES preparation.

c. Remote sensing and automated data processing is available for use and is compatible with current inventory procedures.

2. Analysis

a. Inventory Constraining Factor

When the Challis ES was started, it was established that it would be prepared using existing information. During the preparation process it was determined that additional inventory would be necessary for future ES's to adequately assess the environmental impacts. When the Challis ES was filed, it was challenged by OEPR, CEQ, and NRDC as not adequately addressing impacts. As a result, additional resource inventory was conducted, and a supplemental ES was prepared and filed in 1978. That experience caused BLM to change the ES strategy to include sufficient resource information in the planning process to provide a sound basis for ES preparation. Since inventory must be started 3 1/2 to 4 years prior to the scheduled filing date of an ES, new inventory data could not be made available for those ES's scheduled for completion between 1978 and 1981. This, coupled with a lack of funds, were the primary reasons that inventories were not available. Fiscal Year 1979 was the first opportunity in the budget cycle to request additional funds to carry out an increased inventory program. The 1979 increased funds are being directed toward

collecting resource information for those ES's scheduled for completion in 1981 and 1982. The first statements were filed in September of 1978 and are currently being implemented. The decisions derived from the various ES's appear to be sound. However, some of these decisions will be challenged in court. This will be the test that will determine whether sufficient information was available on which to base land use decisions.

Once inventory has been initiated on a particular planning unit or RMP in support of the grazing ES schedule, changes in schedules or areas cause adverse effects on inventory capability. The time frame from start of inventory to filing of ES can be compressed only so much to allow time necessary to conduct, analyze, and develop the outputs. Compressing the time frame beyond a reasonable point (48 months) will result in incomplete data, analysis, and land use decisions.

b. Inventory Inadequate for ES Preparation

Inventory and Data made available to ES teams (through the planning system) have been described as inaccurate, erroneous, outdated, or incomplete. This inadequacy of data was mentioned by 80 percent of the respondents to the ES questionnaire as a major reason for the excessive preparation time required, the analytical inadequacies of the ES, and the frustrations experienced by team members. Only 20 percent of the participants reported adequate inventory data.

With increased expenditures for inventories, the data deficiency problems should be mitigated in preparation of future statements. Data shortage was a critical problem on the short-term ES's, a substantial one on interim ES's, and will never be completely eliminated as an obstacle.

The new soil-vegetation inventory method, while not a panacea, should be adequate for most planning and ES purposes. One key problem anticipated is the ES scoping requirement of the CEQ regulations. If ES scoping reveals a critical area needing close analysis of impacts that was not picked up at the inventory stage, last minute data gathering will be required to meet the needs for ES preparation. Alleviating this problem will rquire a more thorough pre-inventory analysis.

c. Remote Sensing and ADP Technology

The Application Systems Verification Transfer (ASVT) is a 3-year study to determine the applicability of remote sensing to resource inventory. The study is presently in the 3rd year and indicates that it may be applied to current inventory procedures. The remote sensing coupled with ground truthing provides a procedure that can speed up the inventory process and make data directly available for analysis through data processing.

Using the technology that is available will increase capability by inventorying larger areas in one year. Weather and seasons dictate time when inventory must be conducted. Therefore, if larger areas could be covered during the critical seasons, both time and funds could be utilized more efficiently. Remote sensing, including aerial photography, provides the greatest opportunity to streamline the grazing ES process and place less demands on those programs required to provide inventory for the planning system to meet ES schedules.

The automated process of calculating and storing resource information improves efficiency and lessens the chance of error. The automation of SVIM information is an example of the recent trend toward use of the automated process. Slippage has occurred causing delays in bringing automated operation of the process into play. Automated systems must be designed to meet user needs, therefore, experienced users must help in systems development. This will speed up the operational process, and ensure that the data stored can be given to the user in a manner that is useful for decisionmaking.

D. Planning

1. Findings

a. Land use plans have generally been inadequate to meet the demands of grazing ES's.

b. The proposed resource management plan (RMP) process will merge the planning system and ES program into one system beginning in FY 1983.

c. Automated data processing provides increased analytical capability for developing land use plans with greater efficiency and accessibility of data for ES preparation.

2. Analysis

a. Planning Inadequate for ES Preparation

Land-use plans are often generalized, or fail to adequately address and resolve key issues. A major problem is simply insufficient quality control, leaving it to the ES teams to discover (and in some cases, correct) weaknesses. Only 27 percent of respondents to the

ES review questionnaire said they had adequate planning documents; however, over 58 percent had expected that complete documents would be available when they first joined a range ES team. This is expected to become less of a problem, since the newer URA-MFP's are completed with the realization that they will be subjected to full ES scrutiny.

Under the present situation, a planning system that receives only general reviews for quality control is being subjected to extremely close scrutiny by an ES team. Weakness in the land use plans usually becomes very conspicuous. This problem delays the ES team and requires additional effort to react to deficiencies.

b. Proposed Resource Management Plan Process

Proposed planning regulations were published in the Federal Register in December 1978. This will change the present planning boundaries from planning units to resource areas and incorporate the land use plans and environmental statement into one document encompassing the same area. The proposed regulations are a broad perspective of the new RMP concept, It is not certain that RMP's will meet the grazing ES requirement as established by the court. It has been assumed, however, that the RMP process can be developed to meet grazing ES requirements. If the RMP does not meet the court ordered requirement, it could require a supplemental ES that would add at least one more year to the four year time frame from the start of inventory to filling the final ES.

Once inventory has been started on an ES area, there is little flexibility to change the schedule. Since inventory is conducted three and one half to four years prior to completion of the ES, changing the planning area boundary or enlarging it will require additional funds and extended time to complete the RMP.

It has been proposed that the RMP procedures be developed to start a pilot project in FY 1980 for completion in FY 1981. If the procedures have been sufficiently defined, transition from planning units to RMP's could begin on a broad scale starting in FY 1982. Inventory however, has been started on areas scheduled for ES completion as far out as FY 1983. Since inventory for RMP's cannot be started before FY 1980, RMP's prepared to correlate with the grazing ES schedule cannot start on a broad scale until FY 1983.

Inventory schedules will have to be in line with RMP schedules starting in FY 1980. To accomplish this, alignment of RMP schedules for FY 1983 and beyond will have to be developed and court approved, if necessary, before the end of FY 1979 to allow inventory adjustment in 1980.

c. Efficiency Provided by Automated Data Processing

The Bureau is in the process of providing an automated information system through the Strategic Plan. This plan will provide BLM with a tool to more effectively and rapidly retrieve and display information for decisionmaking. It will also assist in analyzing and comparing data in dimensions that will greatly improve resource management. A common concern expressed by field personnel involved in ES preparation

is that both inventory and planning information must be reanalyzed or manipulated before it can be used in ES development. The automated information system will provide consistency and accuracy of data that can be manipulated for comparison and necessary arrangement directly applicable to ES preparation needs. Development under the plan is in process, but has been slowed down because of higher priority needs for funds and people. Computerizing the SVIM information has been a slow tedious process with slippage in planned operational dates. These slippages are primarily caused by lack of direction on what the computer is expected to produce. To alleviate these types of problems, benefitting activities will need to place more emphasis on getting the system operational.

E. Organization

Organizational arrangements of ES teams or placement of personnel with either planning or ES responsibilities in State Offices or Districts did not have a significant impact on ES preparation or ES team morale. Most findings relate to the manner in which the organization operated or the manner in which functions such as review, direction, and management were conducted.

1. Findings

a. Organizational changes proposed in the WO reorganization eliminate the Division of Environmental Assistance and place ES coordination responsibilities in the Office of Planning, Inventory, and Environmental Coordination. This transfer of responsibility can create the potential for range ES inefficiencies until the details are worked out.

b. Present review procedures for the range ES program require the involvement of too many levels of the organization and are time consuming, complex, and have resulted in contradictory guidance.

c. The range ES program is placed outside the traditional flow of BLM program responsibilities and is not sufficiently incorporated into the inventory, planning, and implementation process.

d. Organizational structure of ES teams, whether at State or District levels did not show any noticeable difference in time of ES preparation, efficiency or team member morale.

2. Analysis

a. Organizational changes will require coordination of responsibilities. Given adequate staffing, the proposed reorganization of the WO will result in a sound organizational structure to manage the range ES program. Adverse impacts can be expected to be manifested during FY 79 unless prompt, detailed identification of functional responsibilities are clearly assigned to organizational units with the responsibility.

BLM uses a decentralized inventory and planning system with most control delegated to the States, with only broad oversight from the WO through manual guidance and the AWP/budget process. This has been followed by a highly centralized review and assistance approach toward the preparation of ES's.

At present, the WO Divison of Environmental Assistance (DEA) has provided review and assistance for preparing grazing ES's. This division has now been eliminated. Neither the Division of Range Management nor the Division of Planning, Inventory and Environmental Coordination can assume the increased workload at past levels of efficiency, unless additional pos-

itions are allocated to one or both remaining staffs. The loss of skilled personnel is certain, since personnel from (DEA) are transferring to other programs. Continuity in WO oversight will depend largely on Range. As a result the following services/projects are in jeopardy of being eliminated:

- WO - sponsored training for ES teams
- The preparation of written guidance for interim range ES's
- Technical and procedural review of ES's

b. Present review procedures require excessive time and create contradictory guidance. The standard schedule for a range ES allocates from 12 to 15 weeks for formal review by the WO and the Office of Environmental Review. The review process represents, at most, 15 percent of total ES preparation time. This time, however, does not include the time required of ES teams to revise, rewrite or otherwise make changes in response to findings of reviewers.

In 87 percent of the responses to the questionnaire, by range ES team members, the review process was identified as the single most redundant and frustrating phase of their ES experience. Changes required by the WO, and OEPR were considered major by 46 to 51 percent of team members while minor changes were required by team management or District Offices according to 51 to 56 percent of team members. In the opinion of team members, the validity of changes required declines sharply as proximity to the writing effort changed. Changes in ES were considered positive in 84 percent of the cases requested by team management, 61 percent by District Offices, 52 percent by State Offices but only 34 to 37 percent of the changes requested of Washington and higher levels were considered valid.

The criticism is not of the review process as such. In fact, there were occasional comments by ES team members acknowledging the importance of technical review by each of the various levels and an awareness that the review process was a necessary and legitimate step in the development of a quality document. In every case, however, where written comments were submitted by questionnaire respondents, there was unanimous condemnation of the manner in which the review process was exercised. Appendix #4 documents some of the pertinent comments submitted by questionnaire respondents.

The obvious "layering" of review levels; team management, District, State, Service Center, Washington, OEPR, and public is viewed by the ES team members as duplicative, sometimes contradictory and the single most obvious procedure contributing to ES schedule delays.

c. The range ES program is not incorporated into Bureau programs. ES team participants indicated that the ES process as an integral part of the Bureau land-use planning program has not been fully recognized nor implemented. While only 11 percent categorically stated that they believe that the ES they were working on would not be of significant value in BLM resource management, and 26 percent stated that they felt it would, the remaining 63 percent expressed doubt that it would be of value or felt that it would only be of limited value. A number of respondents felt that the inventory data acquired in preparation of the grazing ES would also be useful data for developing better management plans and that the analysis of the alternatives required in the ES would lead to better management. These responses came from ES participants who, in slightly more than 50 percent of the cases, had previously taken part in the URA, MFP, or AMP portions of the Bureau planning system.

The ES team effort is structutally, and often physically, organized outside the operational flow of other Bureau programs at the District and State levels. This organization identification, while a necessary and valid form of project management, tends to accentuate the perception voiced by two out of three ES team participants that their range ES efforts were not really a part of the Bureau's ongoing program. This problem is best illustrated in the development of the proposed action which has been the focus of ES analysis. The proposed action is a product of the planning system and is the result of an interdisciplinary analysis similar to that used by the ES team to write the ES. However, when analyzing the proposal, ES teams often find weaknesses in the planning recommendations, posing the possibility of severe environmental impacts. Management then must change the proposal, accept an ES that shows serious impacts, or keep the proposal and forbid the team to fully disclose the impacts. If the proposal is changed, a "ripple effect" is caused, requiring the impact analysis section of the ES to be rewritten. This situation creates a tension between those who develop the proposal and the ES team, with the latter assuming the role of a "truth squad." The ES is an excellent check of the adequacy of the land use plans. However, deficient plans result in a loss of efficiency in the ES writing phase and it causes alienation of the ES team from the District. At worst, it creates a situation where allegations of data manipulation or mismanagement have been made.

A separate study concluded by a BLM study team in June of 1978 arrived at conclusions similar to this finding. The report, Planning Coordination Organization Study, while focusing primarily on BLM planning organizational needs, did however, find that:

> "Most respondents (to the team questionnaire) felt that planning should be related to Environmental Assessments and statements by: showing areas of environmental concern; defining uses that would or would not be allowed; providing a data base for EAR and ES information and that EAR's and ES's can be a source of additional planning data.
>
> Comments also indicated that these two systems are not yet linked together as well as they should be, and also, if planning is done properly no further environmental assessment is necessary." (Appendix 2, page 11)

d. Organizational structure of ES teams were not significant factors in team efficiency or morale. BLM range ES teams are of three basic types: State Office teams, District teams, and contract efforts by an outside organization. In addition, Utah, there are basic core teams assigned to Districts where they are responsible for the ES's in that District as well as ES's assigned in other Utah Districts. State Office range ES teams are functioning in the remaining States (Utah variation included). In Arizona, the only range ES to be done under a contract was completed, and another ES is scheduled to be negotiated in the Phoenix District for FY 1979. Appendix #5 shows the typical organizational arrangement of each structure.

There are specific advantages and disadvantages to each organizational format at the State level. Historically, most States have opted to structure their ES teams at the District levels for technical and management reasons. Technically, location of teams at the District level permitted the assignment of specialists most closely associated with the study area and those most closely related to the materials to be used at each district. For management reasons, the distribution would result in the

least disruption of personnel as far as movement from their homes was concerned and would involve those most responsible for eventual implementation to be directly involved in ES and planning development.

In the two States that have retained a State Office core team for range ES preparation, there was a prior structural organization to which these range ES teams were attached. Oregon for example, for reasons of travel and skills availability, had structured their timber ES teams at the State Office level and continued to extend this structure to range ES's. Montana had a prior ES organization for coal. Technical advantages of State Office core teams appear to be their uniformity in procedures and access to State level expertise. From a management standpoint, it provides greater permanency to the team organization, simplifys management span of control, and appears to reduce communication and review levels.

The organization and operation of ES teams, either at the District level or State Office level did not significantly evoke positive or negative comments from the questionnaire responses Most participants felt that their team leadership was good, and the response to the reviews and assistance provided during the early development of the ES by team leaders, District and State Office members and even WO personnel was positive. Problems did not come to light until the review process began. Most respondents were complimentary or philosophical about the availability of skills to the team, complained in a normal way about facilities, and projected a dedication to their professional specialties and the responsibility of "getting the job done."

least disruption of personnel as far as movement from their homes was concerned and would involve those most responsible for eventual implementation to be directly involved in ES and planning development.

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This observation is borne out by response to question #15 of the questionnaire in which responses from 215 BLM ES team participants indicated their general level of satisfaction or frustration with their ES experience. Appendix #6 shows that team participants from Montana and Oregon, where there were State teams only, did not respond any differently than participants from states using District or contract teams. Since there is only one case of a contracted ES, evidence is not conclusive as to the most effective organizational arrangement for administration.

A majority, 52 percent of ES team participants, felt that the establishment of a permanent local "core team" was the preferable alternative to contracting, ad hoc or State level teams. The question, however, was not asked whether these same people would be willing to serve on another ES team. The disadvantages of a discrete ad hoc ES team can be summarized as follows: (1) produces communication problems between the ES team and District staff generally; (2) reduces the ability of District staff to meet on-going program needs; (3) promotes uncertainty among ES team members in regard to their reintegration into District activities; and (4) in general fosters personnel problems of sufficient intensity to produce adverse impacts on the Bureau's long term management goals.

F. Management

1. Findings

a. BLM ES team participants perceive the range ES program as lacking in management commitment - this is viewed as a lack of coherent policy guidance, unclear goals and low priority.

b. The current ES tracking system is not sufficiently comprehensive and unified to identify schedule slippages at an early stage and to assess the cumulative impacts of slippages in inventory or planning.

c. The participants in the range ES program are suffering from a serious morale problem.

2. Analysis

a. ES team participants' perception of lack of commitment and guidance.

It was difficult to reconcile the finding of lack of commitment and guidance with what appeared to be such an abundance of manual releases, instruction memorandums, budget and program activity directives, and the written guidance provided each team as its preparation plan is reviewed. Yet, when 76 percent of BLM employees participating in the ES program indicated that they expected to receive detailed guidance but only 21 percent said they did get such guidance, and 38 percent stated that they did not, there is obviously a basis on which to question the effectiveness of such materials or their utilization.

Comments provided by those responding to the questionnaire indicate that printed documents and written guidance are counter-productive. Management is perceived as "contradictory and nebulous" by field ES participants who have asked for "detailed guidance or a boiler-plate ES". Appendix #7 is included to summarize the comments received and to document the extremely high level of response, mostly critical, that ES team participants made. In general, there were repeated criticisms of management style, management commitment, management understandings, and the feeling that management was "product oriented" while the field professionals were primarily concerned with the "integrity and professional quality" of their input.

The concerns expressed that there was a "lack of commitment" to the ES program of the Bureau do not appear to hold up as a general perception. For example, 82 percent expected management to give high priority to the ES program and 86 percent indicated that they found it to be so. Only 15 percent indicated that high priority was not given to the program. This same perception of ES program priority was noted at all levels from 98 percent feeling that team management placed high or medium priority to the ES program with slight decreases in District, State, Washington Office, and Department priority ratings to a low of 79 percent.

A word of caution must be added to this review of management commitment however. While it is a acknowledged that many team participants gave high marks to management program commitment. There was a general frustration over the impression that management is product oriented or that program priorities tended to limit the willingness of management to properly consider all alternatives. There were enough written comments alleging that information considered important by individual specialists was ignored or otherwise mismanaged and not properly included in the ES. This, in the minds of some participants, translated into proof of a lack of commitment for quality.

b. The tracking system is not sufficiently comprehensive. High priority in the inventory and planning programs is just as vital to meeting the court-ordered ES schedule as is the ES writing effort itself. It is clear that placing the ES's as a high priority would be an effective

way to insure that the schedule is met, but the overall effort must be properly managed. The findings of the Idaho State Office GME (June 5-16, 1978) is illustrative of the problem:

> "There are no signs that the Idaho SO has made any attempt to assess the entire job ahead to determine a best overall strategy for accomplishment. District Managers feel that they are "on their own" without benefit of leadership, guidance, constructive criticism or quality control from the Idaho SO. They also feel that they are not profiting from lessons learned in other Districts. They hold little hope that they will receive any help until it is too late. Presently, all SO attention and assistance is being directed toward the Challis ES. When it is completed, the focus will shift to the next crisis and so on down the schedule."

The review team does not know exactly what the current progress is; whether the BLM-wide inventory program is on schedule for FY 1979; whether FY 1981 statements will have adequate inventory data and whether planning is proceeding on schedule. While some States and Districts are controlling the process adequately, overall it is clear that program management must be overhauled, and unfortunately there is no well defined focal point to insure that this is done. Explicit priorities must be set regarding "high priority" programs, if all are "high" then none is high. The focal point for ES preparation responsibility must be fixed at all levels, and managers called to account for failures to produce. In short, controls must be established at all levels and management must aggressively follow up to eliminate deficiencies.

The "crunch" impacts most on the ES team. Slippages in inventory and planning that may take place do not generate the same crisis and compulsions to involve top management as does the subsequent failure to meet a scheduled DES or ES. This awareness of the time or scheduling crunch is, unfortunately, a commonly accepted part of ES team participation. Only 51 percent of field team participants expected normal working hours when they were assigned

to ES work and 67 percent reported that they did not get normal working hours. In actual ES work, 60 percent said that there was no sufficient time to do their work.

There is, of course, a difference between knowing that a schedule is slipping and having sufficient information at the right place and at the right time to know where action can be taken to remedy the situation. The ADP "Project Management Control System" has potential to assist in the management of the ES process. This program is now available in the DSC on the Honeywell computer and can be used by managers at all levels to monitor and control inventory, planning, and ES schedules. In addition, the Operational Planning System (OPS) monitors the progress of inventory and ES preparation during the year. Reports are prepared by individual States on a quarterly basis. The information is primarily used by budget to keep the Director abreast of the Bureau's progress in meeting ES commitments. The reports also provide information and alert responsible resource divisions to problem areas. At the present time, the OPS system is utitilized by a very limited number of Bureau managers.

c. The range ES program is suffering serious morale problems. Appendix #8 presents the profile of a frustrated BLM employee. It is a composite of the several hundred field employees onto whose shoulders will fall the primary responsibility of preparing range ES's between now and 1988. The responses of an unrecorded number of frustrated employees who have resigned from the Bureau are not included. Based on 215 responses of ES team members or those who charged 40 or more hours to ES job codes, 1.9 percent described their ES experience as greatly satisfying,

17.2 percent as usually satisfying, 21.9 percent as OK, 42.8 percent as sometimes frustrating, and 16.3 percent as totally frustrating.

Many participants, when asked what the most effective aspects of BLM's range ES program were, confirmed their disenchantment of the ES process by stating categorically that there were none. A few did, however, point out positive work experiences with the people they came into contact with or stated a belief or hope that the data gathered and the analysis required would lead to better BLM management plans and actions.

Throughout the many responses submitted by ES particpants, there is one clear message - BLM ES participants want to do a professional job. They want to feel that their contributions will be of use and of value in resource management. A surprising 29 percent indicated that there was no need for additional considerations to alleviate personal hardships associated with their ES assignment but 74 percent indicated frustration with unnecessary or redundant activities in the range ES process that they felt should be eliminated. In every instance, the area that was considered unnecessary or redundant referred in one form or another to the review process. In short, BLM ES participants seem to be saying that they accept the pressures and inconveniences of their ES assignment as a price they must pay for improved resource management, but that they are increasingly intolerant of mismanagement. They feel that they have a right to expect clear and definitive decisions, accept procedures that are necessary but cannot condone duplicative or contradictory procedures.

Another significant aspect of the morale problem that is repeated throughout the many responses in the questionnaire is the isolation felt by many of the field participants working on range ES's. They feel that the ES is not an integral part of BLM on-the-ground activity, that it is viewed as an infringement on the time and resources of a District and that their work is not really a high priority program of the Bureau. Field ES participants considered that management support was highest at the team level and that it significantly declined as the program concerns moved from the District, to State, WO, and Department levels. High support for program emphasis was reported by 86 percent of ES participants at the team level, and declined to 49 percent at WO/Department levels. Support for professional judgment 62 percent at team level, declined to 14 percent at WO/Department levels, and validity of requested changes from 84 percent valid at team level to mid 30 percent at WO/Department levels. This "we" against the rest of the world perception seems to have led team participants to feel that it is the professional at the local level who is knowledgeable of the situation, who is really the only one that is concerned with resource management, and that those in the State Office or Washington Office are concerned only with the ES as a product.

An analysis of employee levels of frustration with their ES experience does not lead to any simple conclusions. For example, the distribution of employees with varying degrees of satisfaction or frustration among the various BLM States does not lead to the identification of any one State where either satisfaction or frustration was significantly high or low. Other correlations between ES participants' levels of satisfaction or frustration relative to: their expectation when first hired, availability

of inventory and planning data, assignment to work skills, availability of time to complete work, and expected priority for ES effort all clearly showed that those reporting frustrations exceeded those reporting levels of satisfaction. As the individual participated in subsequent grazing ES teams the morale situation appeared to worsen. For those reporting on their first ES team effort, the reported levels of satisfaction totaled 23 percent while 57 percent reported some level of frustration; the subsequent experiences on ES teams showed a decline in levels of satisfaction to 10 percent and frustration increased slightly to 65 percent.

No single factor seems to be the cause of employee morale problems. Even changes in the review process would not resolve all the frustrations that appear to permeate the total ES experience. Additional experience and further related training does not seem to have any remedial impact. In fact, more of the same seem to confirm the conviction of ES participants that mismanagement has been institutionalized.

G. Contracting

1. Findings

a. In making determinations whether to contract for ES's or to complete the statments inhouse, cost comparisons in accordance with OMB Circular A-76 may be required.

b. Quality end products can be achieved, and court ordered deadlines met through contracting for total ES preparation.

c. Contracts, if properly written and professionally administered by trained BLM personnel, can reduce the number of BLM technical staff required to prepare ES's.

d. Contracting can be implemented in FY 1980 for ES's due in FY 1981 if essential actions regarding model statements of work, evaluation criteria, internal support requirements, trained contract managers, COAR's and Project Inspectors and other critical preliminary conditions are initiated immediately.

e. Contracting would alleviate many of the administrative support and employee morale problems.

f. Multiple contracts for components of statements to be prepared in-house are complex, expensive and do not consistently result in satisfactory products.

2. Analysis

a. Requirements of OMB Circular A-76.

OMB Circular A-76, revised March 29, 1979, is a comprehensive statement of policy regarding reliance on the private sector for commercial or industrial products or services which the Government needs. Except where strictly governmental functions are involved, or where no commercial sources are available, the major factor in making in-house vs. contract decisions is cost. The circular requires elaborate cost comparisons of both in-house and current contract activities using a Cost Comparison Handbook which accompanies the circular. Decisions reached are to be implemented through the budget process.

The definition of what constitutes a "commercial or industrial activity," and thus covered by the circular, is subject to broad interpretation. It is not clear whether the court-ordered range ES's are within its scope. Because this revision to the circular is so new, and because of its

potential impacts on many Bureau of Land Management activities, the Range ES Review Team suggests that the Bureau not defer on this issue but embark on a contracting effort until implementing instructions are issued by the Department and total impact can be assessed.

b. Quality end products can be achieved. Only one range ES (Cerbat-Black Mountain) has been prepared by contract. The contractor produced a satisfactory product within the scheduled deadlines. However, costs and burden on BLM manpower were higher than anticipated. Although the preparation cost was higher than other ES's, the experience on Cerbat-Black Mountain should not be used to judge the potential efficiency of contracting, nor as a basis for estimating future contract costs. BLM's inexperience with contracting for projects like this was undoubtedly a factor in the problems which occurred. The ES team leader and others believe that costs and demands on in-house personnel could be decreased by 20-50 percent through better planning, management support, training and experience.

Experience on other energy-related ES's as well as the Cerbat-Black Mountain job has demonstrated that contractors can prepare, when properly monitoried, environmental analyses which are equal in quality to in-house efforts. The quality of the deliverables under a contract that is properly administered is potentially quite high. Other agencies routinely use contracts for environmental analysis. Substandard products have been accepted by BLM, but generally their causes were related to faulty planning or execution, and not with the concept of contracting.

The Office of Planning, Inventory and Environmental Coordination has a long-term study in process, assessing the effectiveness of contracting vs. in-house preparation. A report will be available in FY 1980. It is anticipated that there will at that time be very limited experience upon which to base recommendations.

c. Contracts can reduce BLM personnel needs. Contracting should reduce the impact of preparing ES's on BLM technical resources. Procurement does, however, require investment of in-house resources. Precise pre-procurement planning, complete statements of work, and intensive contract administration are essential to successful contracting. BLM's professional resource management people are generally not trained in contract management. Also, experienced BLM resource managers must be assigned because the work requires significant decisionmaking, skills in monitoring, redirecting and handling highly paid contract professionals, and knowledge of project management techniques. The contract manager is actually in charge of the ES project, a position of significant responsibility. He also requires the support of different specialists at various times, e.g., for review of certain aspects of a proposal, review of deliverables, etc.

A decision to contract ES's would require additional positions in the DSC, Branch of Procurement, assuming that this work is additive. One senior contract specialist could handle five contracts (preaward and extensive postaward involvement), assuming that preliminary development work (training of COAR's, statement of work guidelines, etc.) is accomplished. One clerk would be needed to support five contract specialists.

If extensive contracting is employed, we must devise ways to maximize and benefit from the experience gained through contracts. Because many States and Districts are potentially involved, learning will be slow unless we immediately transfer experience gained. One way to do this is to establish at DSC a core group of highly competent resource managers with environmental analysis experience to develop the guidelines and training necesary to get this effort started, to review statements of work, participate in Technical Proposal Evaluation Committee (TPEC's), and provide other pre-award assistance to the State Directors and DSC Procurement. This group would, through experience, develop expertise in all aspects of this process and be able to implement changes for future statements. This approach would accelerate the learning experience and maximize efficiency through application of that experience to succeeding jobs. It would also provide up-front assistance to all States in preparing contracts.

Because of the anticipated workload in range ES's and inventories, there may be justification to consider establishing within the State organization (probably Resources) a unit responsible for contract management of resource study contracts (this would include inventory, ES's, research, etc.). A similar arrangement exists in the Alaska cadastral survey program. Because Alaska accomplishes about one-half of its annual surveys by contract, it established a Branch of Contract Surveys in the Division of Cadastral Survey. The Branch is made up of professional surveyors whose job is to design, draft and administer survey contracts. This approach has been very successful because of high level of both professional cadastral survey and contract management skills and experience has been

developed and blended. If contracting is to become more prevalent in the resource disciplines, a similar effort to develop professional contract managers will be required.

After the C-BM contract was awarded, two participants in the effort (Dick Miller of the W.O. and Dick Meninger, DSC-Procurement) drafted an extensive and thoughtful memorandum (Information Memorandum 77-200) which related to the field what they had learned from that experience. It included detailed guidelines and formats for assessing the manpower and cost implications of in-house vs. contract performance, and for planning for such support. It also gave some guidelines for designing and developing the procurement package. This effort, if expanded upon and further developed by the appropriate people using the Cost Comparison Handbook included in OMB Circular A-76, would provide a significant starting point for launching an ES contracting effort, the principles of which would apply not only to range but other types of ES's.

d. Contracting can be implemented in FY 1980 for FY 1981 ES's. Because of timing requirements, contracting is not possible for FY 1979 statements, or practical for those statements due in FY 1980 with teams now formed. Contracting for FY 1981-1983 statements is a valid option. If the Bureau is to implement the use of contracts to any significant degree, planning and development must start now to train and assist the necessary people, identify funding and required internal support (both technical and procurement).

The RMP combines the Bureau planning system and the ES into one process where land use decisions are formulated. Therefore, the feasibility of contracting the total RMP or its component needs further study.

e. Contracting would alleviate many problems. Contractor teams are responsive and capable of meeting tight deadlines. This responsiveness is due to the contractor's ability to quickly assemble or move personnel of high quality without regard to personnel ceilings or procedures, to acquire space and equipment, etc. The Cerbat-Black Mountain statement contractor met all major deadlines and was quite responsive to BLM needs.

Results of the survey conducted by the task force indicated that BLM participants in the range ES process are opposed to contracting the total statement. Only 10.4 percent favored it, 72 percent opposed and 18 percent believed it is "possibly" a valid approach. Twenty-one percent favored component contracting, 37 percent opposed, and 42 percent thought it was possibly valid. No reasons or explanation of these opinions were offered. If this oppositon were based on widespread experience, the review group would advise against the use of contracts. However, the small percentage of persons with actual experience on a total ES contract viewed it more favorably. It is probable that a large part of the negative reaction was based on unfamiliarity with the process. Interviews with individuals involved with the C-BM ES were confident that costs and support work/months could be reduced.

f. Contracts for multiple components are too complex. When considering contracting, there are three alternative approaches:

1. total ES contract
2. several different contracts for individual components
3. one contract for one or more components

The most efficient approach is a total contract, because it places total responsibility for execution, coordination and correlation on one contractor. Multiple contracts for individual components should not be used for a number of reasons:

1. inability of many contractors to carry out an interdisciplinary approach
2. likelihood that the variety of contract schedules won't mesh properly
3. cost and schedule impact on all contractors if one or two lag
4. total burden of responsibility placed on BLM for coordination and delivery of an acceptable ES
5. difficulty in attaining consistency in style and format
6. too much time required to develop, evaluate, award and administer several contracts

Chapter III
Conclusions and Recommendations

This chapter summarizes the conclusions that relate to findings discussed in Capter II. Recommendations designed to address identified needs to improve the Bureau's capability to efficiently complete quality grazing ES's are listed according to areas reviewed.

A. SCHEDULE

It has been determined that ES preparation steps scheduled to meet the September 30, 1979 filing date are not on schedule. The Bureau will not meet the ES's scheduled by court order for completion in 1979 unless immediate steps are taken to correct current slippages. Inefficiencies have occurred since the grazing ES's were first started and will continue to plague the program unless immediate steps are taken to streamline the preparation procedures. In addition, new CEQ regulations will impact all ES's scheduled for publication after July 30, 1979. Streamlining the ES procedures will ensure that the current schedule be met; however, budget constraints and upcoming events will not allow the schedule to be accelerated until FY 1985.

Recommendations:

- Immediate steps be taken by the Washington Office and those involved State Offices to develop a plan of action and provide necessary resources to ensure that the ES's scheduled for completion in 1979 be filed by September 30.

- All ongoing 1979 ES's and those 1980 ES's that have completed preparation plans and an ES team assembled be negotiated with CEQ for preparation under the old guidelines.
- The grazing ES schedule not be accelerated until 1985.

B. STRATEGY

The grazing ES strategy changes the forage allocation procedures to a vegetation allocation starting in FY 1981. After this strategy was developed, new proposed planning regulations were published. These regulations combine the planning and environmental statement process where a statement is prepared on the total land use plan as a matter of course. This process will include all grazing ES acreages scheduled for completion in FY 1984. Since this RMP process would be used two years after the vegetation allocation procedure would be adopted, vegetation allocation would only be used for 2 years. The current allocation procedures does not only allocate forage for consumptive uses, but also provides for nonconsumptive uses as well. This method constitutes both a forage and vegetation allocation that is considered to be a vegetation allocation strategy. Therefore, any major revisions in the procedures for the two year period would be impractical and time consuming, possibly resulting in slippages due to a new learning experience.

Every opportunity should be taken to combine ES areas where possible without affecting the yearly acreage requirements. This will not accelerate the ES schedule because of inventory and planning needs, but it will reduce the number of ES teams making more efficient use of personnel and reducing ES preparation costs.

Recommendations:

- BLM continue to use forage (vegetation) allocation as its proposed action until Fiscal Year 1984.
- ES's not be prepared on the total land use plan until the RMP process begins.
- A study be initiated to thoroughly explore the possibilities of further consolidations of ES areas.

C. INVENTORY

Resource inventory necessary to support land use planning is the primary constraint imposed on quality ES preparation. Long range planning must be carefully mapped out to ensure that inventory capability is provided 3 1/2 to 4 years prior to the date ES's are scheduled for completion. The level or inventory intensities are controlled by funding as compared to the acreage that must be covered in any one year. Therefore, a preinventory plan must have sufficient scoping to ensure that the most critical information is collected to meet planning and ES preparation requirements.

Since inventory requires more funds and personnel than either planning or ES preparation, streamlined and efficient inventory procedures will provide the greatest benefit to District demands and workloads. Technology is presently available to speed up both inventory collection and analysis. Remote sensing coupled with high and low elevation aerial photography will accelerate the mapping process through mechanical means. This process will directly digitize mapping interpretation for use in analysis.

Computerizing the raw inventory data will allow rapid data manipulation in a form that meets the decisionmaker's needs. It can arrange the data in any dimension or compare it for special decisionmaking analysis. Getting these procedures operational, however, is slow because of the Bureau's reluctance to change proven conventional methods. Accelerating these efficiencies will require more intense cooperation and support between the data processing people and the users.

Recommendations:

- Pre-inventory plans be developed for all planning areas to consider ES analysis and implementation actions.
- Remote sensing be utilized in gathering resource data at the maximum extent of current capability.
- Inventory and planning data be automated at the earliest possible date for flexibilities of use and ease of handling during ES preparation.

D. PLANNING

ES teams are required to make an intensive examination of land use plans in order to prepare grazing statements. These intensive reviews have proven that most land use plans have not met ES preparation needs. The new planning regulations that outline the resource management plan (RMP) method should help solve planning inadequacies since the RMP will be a plan as well as a land use statement developed as one process. However, the current planning procedures will be continued through 1983 for use in preparing grazing ES's. This will require immediate action to ensure that those plans prepared in advance of ES preparation prior to 1984 will have adequate data to meet ES preparation needs. State Office

planning divisions should evaluate current quality control procedures and incorporate those controls necessary to meet ES preparation needs. Automated data processing will also improve analytical techniques that will enable planners to make better use of inventory data on which to base land use decisions. Automation will allow mechnical information manipulation at a rapid rate and portrayal in a useful form. It will alleviate time consuming hand calculations and displays resulting in personnel efficiencies.

Recommendations:

- The planning quality control procedures be evaluated in light of environmental statement needs with State Offices making the appropriate adjustments at the earliest possible date.
- ES schedules and RMP schedules be coordinated to start preparation under the new planning procedures in FY 1983 for completion in FY 1984.
- Inventory and planning data be automated at the earliest possible date for flexibilities of use and ease of handling during ES preparation.

E. ORGANIZATION

The new WO reorganization eliminates the Division of Environmental Assistance (EA) and disperses their function to PIEC, the Division of Rangeland Management and the State Offices. This shift in responsibiliy not only is confusing but will have an adverse impact on quality control unless immediate steps are taken to analyze the responsibility transfer, establish clear cut responsibilities, and provide personnel where workloads have increased.

The ES teams have indicated that the ES review procedure is the biggest stumbling block in the preparation process. A fresh approach must be taken to reduce the review period and ensure that the review comments provide clear direction to the team members. This in itself will reduce confusion and greatly improve preparation efficiency. A concurrent review process where each review level conducts that review at the same time and those comments compiled and edited by the Division of Rangeland Management for transmittal to the ES team appears to be the most efficient method.

The review process can further be refined for greater efficiency if total review authority is given to the State Directors. As soon as a State demonstrates that it has the ability to produce quality grazing ES's without detailed WO or Departmental review, the review authority should be delegated to that State. This authority will place quality control responsibilities at the level where land use planning decisions are initiated, implemented, and defended.

The environmental statement process is generally imposed because the proposed action is determined to be a major Federal action or the ES is required by court order. This arrangement does not integrate the ES process within the normal channels of the Bureau planning system. As a result, the ES must be integrated during its preparation which can cause tension and confusion within the District organization resulting in allegations of data manipulation and mismanagement. ES teams take on the air of being "bad guys" which leads to morale problems. The new planning procedures should solve this situation by incorporating the ES process as an integral part of planning.

The various ES team organizations do not appear to have a significant impact on team efficiency or morale. All but two BLM States have District organized teams. Advantages claimed are that they are more familiar with the area and situations that will be addressed in the ES's and consequently are more able to efficiently analyze environmental impacts.

Recommendations:

- The Director immediately establishes a temporary ES coordinating group to oversee the transition from the old to new CEQ regulations, monitor the preparation of written guidelines for interim range ES's, coordinate training, assist States and District Offices during the transition period, and assure that WO ES responsibilities are carried out during the WO reorganization process.

- Sequential review be eliminated (except in exceptional cases), and the concurrent review process be initiated. This review process should be preceded by the following:
    a. The District proposed action (preferred alternative) be fully reviewed at all levels as early in the ES process as possible.
    b. Chapter I of the ES be submitted for review as soon as it is completed for review at all levels.
    c. Restrictions be placed on changes in proposed actions and Chapter I between the time Chapter II is approved and the DES published.

- Accelerate delegation of ES approval authority to the State Directors.

F. MANAGEMENT

Analysis of questionnaire responses returned by BLM employees who participated on grazing ES teams or who had coded 40 or more hours to ES

of the problems identified by ES team members can be traced to a communication between management and team members. Expectations members were reported to be quite different from their experience. s in turn have expectations or requirements that need to be cated to the team. An early understanding of each others' roles, ibilities, and limitations would be important.

ndations

BLM clearly places the ES program (including inventories and land use in a hierarchy of priorities, and issue clear guidance accordingly. ncludes AWP guidance, periodic evaluations of the range ES programs, R system. Evaluations should concentrate on all aspects of BLM's s affecting range ES's, especially inventories, planning, ES tion, activity planning, and implementation.

Immediate steps be taken to ensure that all ES teams receive formal g in early stages of the ES process. Trained personnel should be d, if necessary, to conduct training until States can assume the g responsibility. Available training material should be provided es.

The Operational Planning System (OPS) be expanded at the headquarters te levels for ES tracking.

A range ES workshop/conference be held in FY 79 for those involved program to refine guidance for interim ES's, and allow the ange of ideas, problems, and solutions.

activities indicates that less than 2% characterized their ES experience as greatly satisfying; over 16% as totally frustrating. The great majority expressed vigorous criticism of the review process, what they perceived to be lack of management commitment to the findings of the ES teams and to the ES process in general. These findings of poor morale and attitude among BLM employees must be addressed. The pressures for meeting court ordered schedules with quality ES's will increase rather than decrease these symptoms of employee frustrations and inevitably impact upon the capabilities of the Bureau to meet its responsibilities.

The concerns and thoughts that obviously went into the many criticisms submitted by ES team participants in the questionnaire reflect the strength of the Bureau. Employees are committed to professional standards of resource management. They are demanding that their judgment be fully considered, that mismanagement be minimized, that more effective lines of communication be opened and that the results of their ES work be incorporated into the Bureau decisionmaking process.

Because the ES follows inventory and planning activities, the ES team always gets caught in the crunch when ES schedule time runs out. Team members and managers also get caught between the priorities of ES preparation and the many crises or other high priority program responsibilities that descend upon them. A tracking system should be developed at the District, State, and headquarters level to monitor the plan established to meet a particular filing date. Problems flagged at any level should be analyzed and prompt action required by responsible management.

G. CONTRACTING

ES contracting was not recommended by respondents of the questionnaires. Most, however, have had little or no experience with ES contracting. Because of this fact contracting the total ES was not ruled out. Further investigations into the possibilities of contracting indicated that it was a viable option that should be accelerated. Many of the morale and personnel problems could be solved through contracting since a contractor would not have restrictions on space or be impaired by personnel ceilings. Contracting would reduce the inhouse work effort and allow it to be directed toward other priority programs. It was also felt that through a carefully designed contracting program, the cost would be comparable to those prepared inhouse.

The 1980 statements are already underway, therefore, accelerated contracting should start with those statements scheduled for completion in 1981. Accelerating contracting will require immediate analysis to determine what statements are suitable for contracting, how many should be contracted, and what support is necessary to carry out an accelerated program. Since most of the Districts have limited experience in total ES contracting, a system should be set up to train and assist ES teams in contract preparation and execution.

Multiple component ES contracting is not recommended due to the complexity that results from various segments of a statement being contracted to several individual contractors. The coordinating problem, time frames, and preparation styles result in greater effort by ES teams to consolidate and smooth out the total product.

The Office of Management and Budgt has recently revised Circular A-76 requiring governmental agencies to rely more on contracting with the private sector. Final determination of how Circular A-76 will affect Bureau programs has not been made, therefore, the current contracting procedures should be continued until Departmental instructions are issued.

Recommendations:

- Determine applicability of OMB Circular A-76 to grazing ES contracting.
- BLM should not attempt to contract for multiple components for a single ES because of the additional complexity and expense of such an approach and the difficulty in attaining a high quality finished product.
- Accelerate grazing ES contracting starting with those scheduled for completion in FY 1981.
- Develop a centralized ES contract assistance staff to provide Bureauwide capabilities for contracting by the start of FY 1980.

Recommendation	Action	Responsibility	Target
1. Develop a plan of action to ensure compliance with FY 1979 schedule.	a. Communicate to SD, Nevada & Utah	Director	Completed (3/5/79)
	b. Develop a plan of action preparing acceleration	State Director	Ongoing (4/1/79)
	c. Identify resources needed.	State Director	6/1/79
	d. WO provide resources necessary	Deputy Director, Lands & Resources	6/1/79
2. Establish a temporary coordination group to monitor WO reorganization of ES functions and staff and oversee CEQ guidelines transition.	a. Identify lead for coordination group.	Associate Director	Ongoing (3/15/79)
	b. Monitor responsibilities of old 220, 330, 260, and SO P&E Staffs.	Coordination Group	Ongoing (3/16/79)
	c. Call initial coordinating group meeting.	Office of Planning, Inventory & Environmental Coordination.	Ongoing
	d. Identify staffing needs to carry out responsibilities of new organization.	Coordination Task Force.	6/1/79

Recommendation	Action	Responsibility	Target
3. Negotiate to prepare FY '79 & FY '80 ESs under old CEQ guidelines.	a. Negotiage with CEQ for approval of ongoing ESs under old guidelines.	Office of PI& Environmental Coordinator.	ASAP
	b. Issue schedule of ESs to be prepared under old guidelines and new CEQ regulations.	Office of PI& Environemntal Coordinatior.	After negotiations completed.
4. Accelerate ES contracting for ESs scheduled for FY '81 completeion and for subsequent years.	1. Issue Instruction Memo to States requesting identification of Grazing ESs that can be contracted for FY '81 completion.	Div. of Rangeland Management	6/179
	2. Negotiate with States to determine specific ESs for contracting.	Div. of Rangeland Management	7/1/79
	3. Identify ES areas for contracting in FY '80 AWP directives.	Div. of Rangeland Management w/ Office of Budget.	10/1/79
	4. Initiate contract assistance efforts.	Task Force	10/1/79
5. Develop a centralized ES contract assistance capability to provide Bureauwide contracting expertise.	1. Form a Task Force to: a) compile available data, forms and commonalities gained in Cerbat-Black Mountain & McGegor experiences.	Div. of Admin. Svcs. w/ Office of Budget.	ASAP

Recommendation	Action	Responsibility	Target
	b) Determine functions appropriate for such a contract assistance staff.		
	c) Determine skills needed to assist Districts in contract procedures.		
	d) Determine organizational placement & management of a contract staff.		
	2. Establish Contract staff or team.	Director	10/1/79
6. Initiate review of ES areas for consolidation.	a. Review current ES acreages scheduled for FY '83 ESs & beyond.	Div. of Rangeland Management	FY '79
	b. Initiate necessary action to consolidate.	Div. of Rangeland Management, States Directors.	FY '79
7. Eliminate sequential review & initiate concurrent review process.	a. Establish procedures for concurrent review by SO, WO & OPER.	Div. of Rangeland Management	6/1/79
	b. Issue instructions to implement procedure.	Div. of Rangeland Management.	6/15/79
8. Accelerate delegation of approval authority to State Directors.	a. Negotiate with AS/L&WR for delegation of authority to Director.	Div. of Rangeland Management.	Ongoing

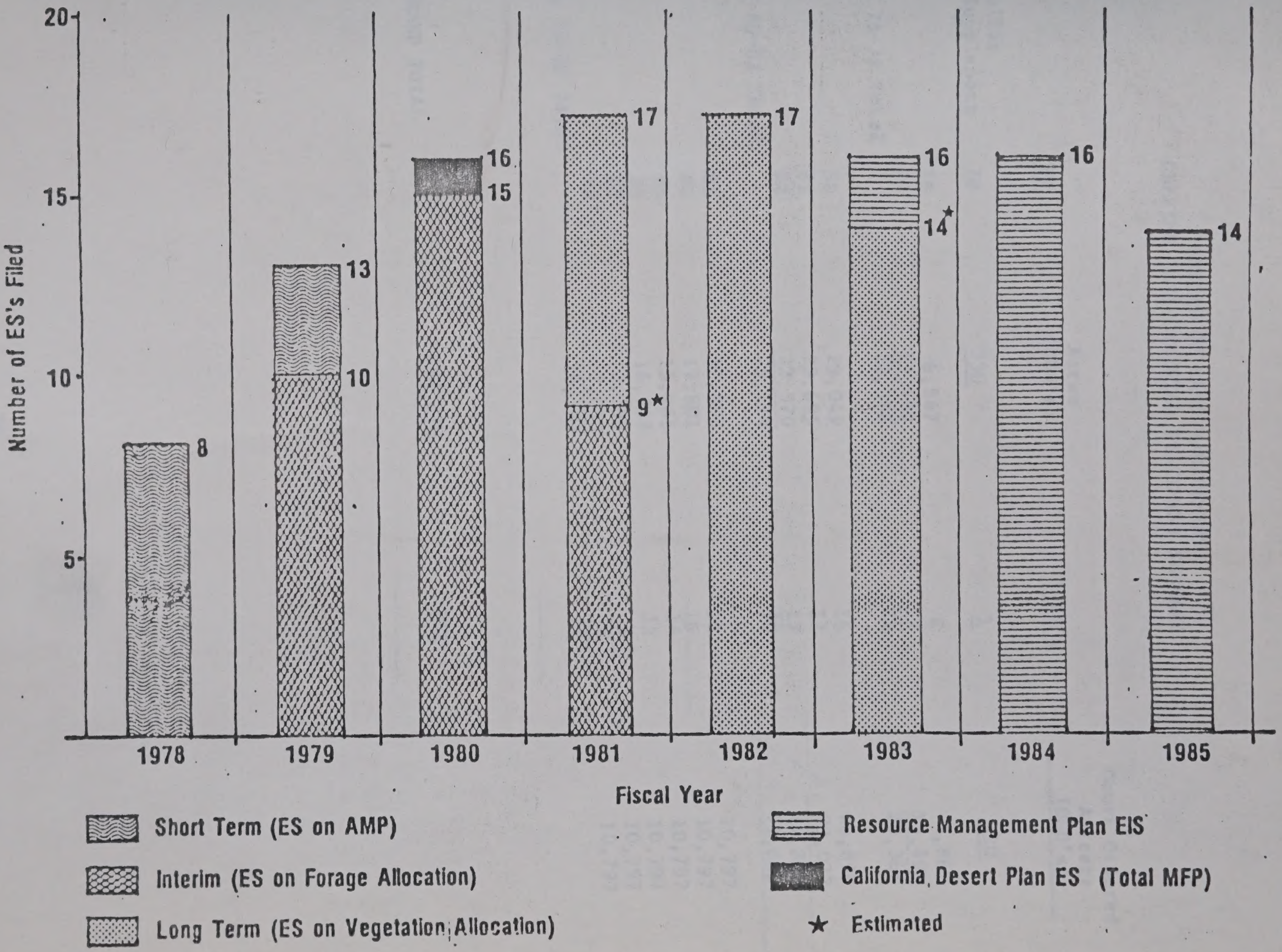
Recommendation	Action	Responsibility	Target
	b. Delegate authority to State Director.	Director	FY '79
9. Utilize remote sensing capabilities for gathering resource data.	a. Identify staffing & funding necessary to make system operational.	Office of Info. Systems	7/1/79
	b. Realign funding & manpower allocations.	Office of Budget	7/15/79
	c. Issue instructions to field to use available remote sensing capabilities.	DD, Lands & Resources	7/1/79
10. Accelerate use of AWP capabilities for inventory, planning & ES preparation.	a. Identify staffing & funding necessary.	Office of Info Systems	Ongoing
	b. Realign funding & manpower allocations.	Office of Budget	10/1/79
	c. Issue instructions to field.	DD for Services	ASAP
11. Continue use of forage/(vegetation) allocation strategy until RMP procedure initiated.	a.. Issue instructions to field	Div. of Rangeland Management	6/1/79
12. Do not prepare ESs on the total land use plan until the RMP process begins.	a. Issue instruction to the field.	Div. of Rangeland Management	6/1/79

Recommendation	Action	Responsibility	Target
13. Develop preinventory plan that will identify data necessary to meet planning, preparation & implementation needs.	a. Develop guidelines and procedures for preinventory planning.	Office of Planning, Inventory & Environmental Coordination.	Ongoing
	b. Conduct workshops or seminars.	Office of Planning, Inventory & Environmental Coordination.	FY '80
	c. Monitor adequacy of compliance with plans.	Office of Planning, Inventory & Environmental Coordination.	FY '80
	d. Evaluate.	Office of Program Evaluation.	FY '80
14. Evaluate planning quality control procedures in light of ES needs.	a. Review SO land use plan processes to identify problem areas.	Office of Planning, Inventory & Envirnomental Coordination.	FY '79
	b. Take necessary action; instruction, assistance, training.	Office of PI& Environmental Coordination	FY '80
15. Place the ES program in a hierarchy of priorities and issue clear guidance accordingly.	a. Establish priority in AWP Directives.	Office of Budget	FY '80
	b. Establish priority in PIPRs.	Supervisors	FY '79
	c. Evaluate ES management emphasis.	Office of Program Evaluation.	FY '79

Recommendation	Action	Responsibility	Target
16. Expand and focus the OPS at the Headquarters and State levels for ES tracking.	a. Review existing tracking systems of activities related to ESs.	Div. of Rangeland Management w/ Office of Budget & Office PI& Environmental Coordination.	FY '79
	b. Incorporate critical tracking elements into OPS system.	Office of Budget & States	FY '79
	c. Issue implementing instructions in AWP Directives.	Office of Budget	FY '80
17. Grazing ES schedule not be accelerated until FY '85 (Completed).	a. Evaluate existing ES acreages and areas scheduled for 1985.	Div. of Rangeland Management	FY '79
	b. Initiate inventory and planning schedules for identified areas.	SO	FY '80
18. Provide ES teams with formal training in early stages of ES process.	a. Refine format and content of ES training.	Div. of Personnel & Training w/WO & SO units.	FY '79
	b. Schedule time and place for training.	Office of PI& Environmental Coordination w/SOs.	Ongoing
	c. Schedule closeout procedure for each completed ES team.	SO	FY '79
19. Coordinate ES schedules with RMP schedules.	a. Initiate necessary actions.	Office of PI& Environmental Coordination w/Div. of Rangeland Mgmt.	FY '80

	Recommendation	Action	Responsibility	Target
20.	Do not contract for mutiple components of a single ES.	a. Include in considerations of recommended ES contract Assistant Staff.	Task Force on contract assistance.	FY '79
21.	Hold a Range ES Workshop/conference in FY '80.	a. Submit proposal for workshop for FY '80 AWP.	Div. of Rangeland Management	FY '79
22.	Determine applicability of OMB Circular A-76 to BLM Grazing ESs.	1. Monitor Departmental & OMB issuances and directives for specific implementation instructions.	Div. of Admin. Svcs.	Ongoing
		2. Issue instructions as necessary.	Div. of Admin. Svcs.	ASAP

ENVIRONMENTAL STATEMENT SCHEDULE AND STRATEGY



BUREAU OF LAND MANAGEMENT
GRAZING ENVIRONMENTAL STATEMENT SUMMARY

	FY	Acres (000's)	# ES's	Court Ordered Acreage (000's)
Challis Supplement	78	330	1	330
	78	6,867	8	6,867
	79	13,499	13	13,499
FY 78-79 Total		20,366	21	20,366
	80	29,049	16	28,898
	81	23,695	17	23,072
	82	22,370	17	19,883
FY 80-82 Total		75,114	50	71,853
	83	17,805	16	10,797
	84	17,801	16	10,797
	85	15,255	14	10,797
	86	16,758	12	10,797
	87	3,397	6	10,797
	88	7,093	8	10,797
Fy 83-88 Total		78,109	72	
GRAND TOTAL		173,919	144	

Appendix 2B

8/4/78

FES DATE FY 1978

COURT ORDER	6,867
PLANNED	6,867
DIFFERENCE	-0-

STATE	ES NAME	PUBLIC LAND AC. (000's)	STATUS AS OF 7/24/78
AZ	San Simon	1,347	DES Filed
AZ	Cerbat-Black Mountain	1,200	DES Filed
CA	Tuledad-Home Camp	641	DES Filed
CO	San Luis	516	FES Filed
CO	Uncompahgre	526	FES Filed
NM	Rio Puerco	393	FES Filed
UT	Hot Desert	530	DES Filed
WY	Sandy	1,714	DES Filed
	GRAND TOTAL	6,867	
ID	Challis	330	DES in Prep.

8/4/78

FES DATE FY 1979

COURT ORDER	13,499
PLANNED	13,499
DIFFERENCE	-0-

STATE	ES NAME	PUBLIC LAND AC. (000's)	STATUS AS OF 7/24/78
AZ	Vermillion	1,340	DES Started
CO	Grand Junction	1,277	DES Started
ID	Shoshone	590	DES Started
ID	Little Lost-Burch Creek	337	Prep. Plan Started
MT	Missouri River Breaks	2,189	DES Started
NV	Caliente	3,414	DES Started
NM	East Socorro	869	DES Started
NM	East Roswell	1,592	Prep. Plan Started
OR	Drewsey	643	DES Started
UT	Randolph	171	DES Started
UT	Parker Mountain	223	Prep. Plan Started
UT	3 Corners	199	DES Started
WY	Seven Lakes	655	DES Filed
	GRAND TOTAL	13,499	

8/4/78

FES DATE FY 1980

COURT ORDER	28,898
PLANNED	29,049
DIFFERENCE	+151

STATE	ES NAME	PUBLIC LAND AC. (000's)
AZ	Shivwits	1,397
CA	Cowhead-Massacre	769
CA	California Desert	11,000
CO	Gunnison	636
CO	White River	1,506
CO	Royal Gorge	498
ID	Owyhee	1,183
ID	Bannock-Oneida	450
MT	Mountain Foothills	1,054
NV	Tonopah	3,750
NM	San Juan	973
NM	McGregor Range	515
OR	Ironside	1,002
UT	Kanab-Escalante	2,498
UT	Mountain Valley	480
WY	Green Mountain	1,338
	GRAND TOTAL	29,049

8/4/78

FES DATE FY 1981

COURT ORDER	23,072
PLANNED	23,695
DIFFERENCE	+623

STATE	ES NAME	PUBLIC LAND AC. (000's)
AZ	Haulapai-Aquarius	943
CA	Mountain Dome	42
CA	Benton-Owens Valley	530
CA	Cal-Neva	639
CA	McCain Valley	94
ID	North Idaho	160
ID	Sun Valley	243
ID	Big Desert	800
MT	Prairie Potholes	1,735
NV	Paradise-Denio	3,642
NV	Sonoma-Gerlach	4,563
NM	Southern Rio Grande	2,156
OR	Lakeview	3,366
UT	Ashley Creek	542
UT	Price River	1,591
WY	Salt Wells - Pilot Butte	1,645
WY	Grass Creek	1,004
	GRAND TOTAL	23,695

/4/78

FES DATE FY 1982

COURT ORDER	19,883
PLANNED	22,370
DIFFERENCE	+2,487

STATE	ES NAME	PUBLIC LAND AC. (000's)
AZ	Harcuvar-Vulture	1,461
CA	Sierra	240
CA	Willow Creek	299
CA	Bodie-Colville	250
CO	Glenwood Springs	528
ID	Ellis	374
ID	Twin Falls	242
ID	Bruneau-Saylor Creek	2,247
MT	Big Dry	1,322
NV	Las Vegas	3,314
NV	Schell	4,182
NV	Reno	681
NM	West Socorro	929
OR	Harney	2,668
OR	Brothers	1,014
UT	Pinyon	1,222
UT	Henry Mountain	1,397
	GRAND TOTAL	22,370

8/4/78

FES DATE FY 1983

COURT ORDER	10,797
PLANNED	18,686
DIFFERENCE	+7,889

STATE	ES NAME	PUBLIC LAND AC. (000's)
AZ	Black Canyon Skull Valley	338
CA	South Sierra Foothills	210
CA	Pit River	401
CA	Redding	311
CA	Yokayo	412
CA	Ohay	115
CO	Kremmling	388
ID	Big Lost - Mackay	439
MT	Headwaters	309
NV	Wells	4,141
NM	Sacramento	1,414
OR	Medford	563
OR	Owyhee	4,008
UT	Tooele	1,710
UT	Grande	1,826
WY	Overland	2,101
	GRAND TOTAL	

8/4/78

FES DATE FY 1984

COURT ORDER	10,797
PLANNED	17,801
DIFFERENCE	+7,004

STATE	ES NAME	PUBLIC LAND AC. (000's)
AZ	Green Belt-Rainbow-Ajo	1,172
CA	Coast Valley	243
CA	Coast	340
CA	Honey Lake-Beckwourth	55
CO	San Miguel-San Juan	959
ID	Cassia	498
ID	Crane Creek-Black Canyon	418
MT	Billings	441
MT	Powder River	1,072
NV	Egan	3,826
NV	Shoshone-Eureka	4,399
NM	Chaco	616
OR	John Day	183
UT	Bookcliffs	1,085
UT	Cedar	1,076
WY	Platte River	1,418
	GRAND TOTAL	17,801

8/4/78

FES DATE FY 1985

COURT ORDER	10,797
PLANNED	15,255
DIFFERENCE	+4,458

STATE	ES NAME	PUBLIC LAND AC. (000's)
AZ	Silver Bell - Middle Gila	458
CO	Little Snake	1,171
ID	Wild Horse	1,237
ID	Medicine Lodge	603
ID	Jarbidge	959
MT	Garnet	151
NV	Fallon	2,422
NM	Southwest	1,607
OR	Spokane	290
OR	Two Rivers	476
UT	Warm Springs	2,219
UT	Box Elder	1,006
WY	Pioneer Trails	1,630
WY	Below the Rim - Dubois	1,026
	GRAND TOTAL	15,255

8/4/78

FES DATE FY 1986

COURT ORDER	10,797
PLANNED	15,877
DIFFERENCE	+5,961

STATE	ES NAME	PUBLIC LAND AC. (000's)
AZ	Little Horn-Kofa Lapaz Havas	1,766
ID	Lemhi	459
ID	Kuna	527
MT	South Dakota	280
NV	Esmeralda	3,373
NV	Eluo	3,260
NM	West Roswell	1,832
OR	Grande Ronde	60
UT	Wasatch	110
UT	San Juan	2,270
WY	Washakie	1,141
WY	Buffalo	799
	GRAND TOTAL	15,877

8/4/78

FES DATE FY 1987

STATE	ES NAME	PUBLIC LAND AC. (000's)
AZ	Apache-Navajo	227
ID	Caribow	180
MT	North Dakota	67
NM	Rio Grande	726
WY	Sublette-Snake River-Star Valley	928
WY	Hannah, Albany, Laramie	1,269
	GRAND TOTAL	3,397

COURT ORDER	10,797
PLANNED	3,397
DIFFERENCE	-7,400

8/4/78

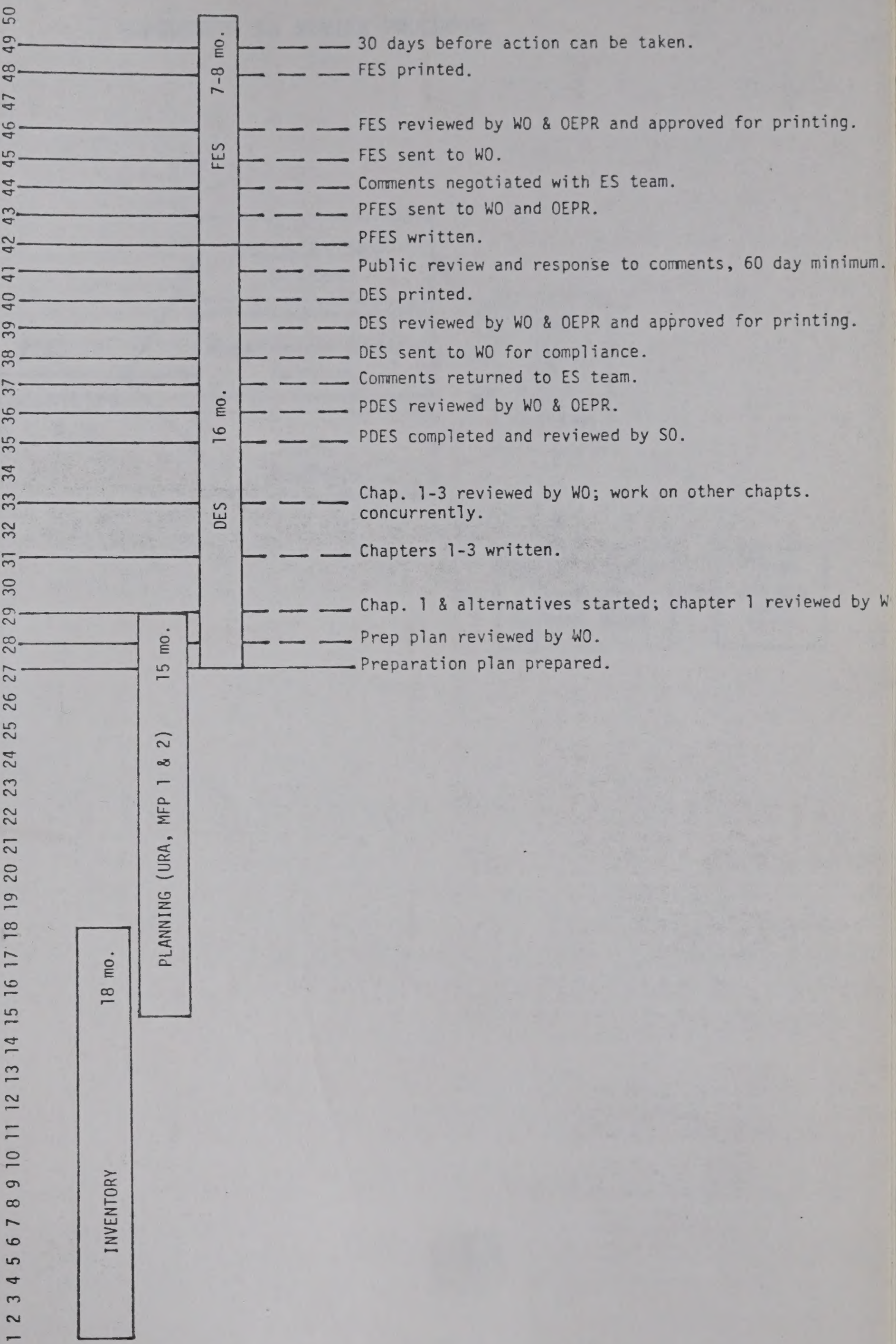
FES DATE FY 1988

STATE	ES NAME	PUBLIC LAND AC. (000's)
AZ	Cochise-San Pedro	119
ID	McCall	32
NV	Walker	1,946
NM	North Roswell- East Albuquerque	227
UT	San Rafael	1,060
UT	House Range	2,343
WY	New Castle	353
WY	Cody	1,013
	GRAND TOTAL	7,093

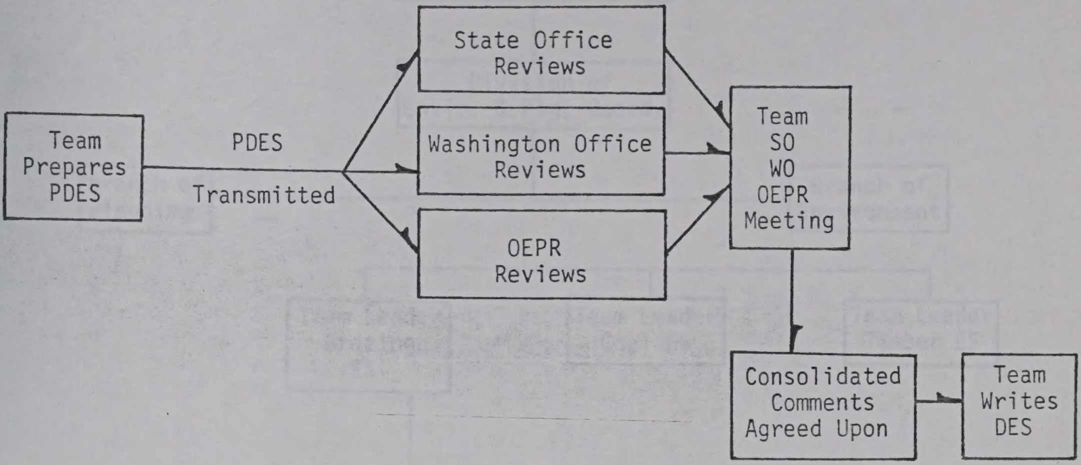
COURT ORDER	10,797
PLANNED	7,093
DIFFERENCE	-3,704

Appendix #3

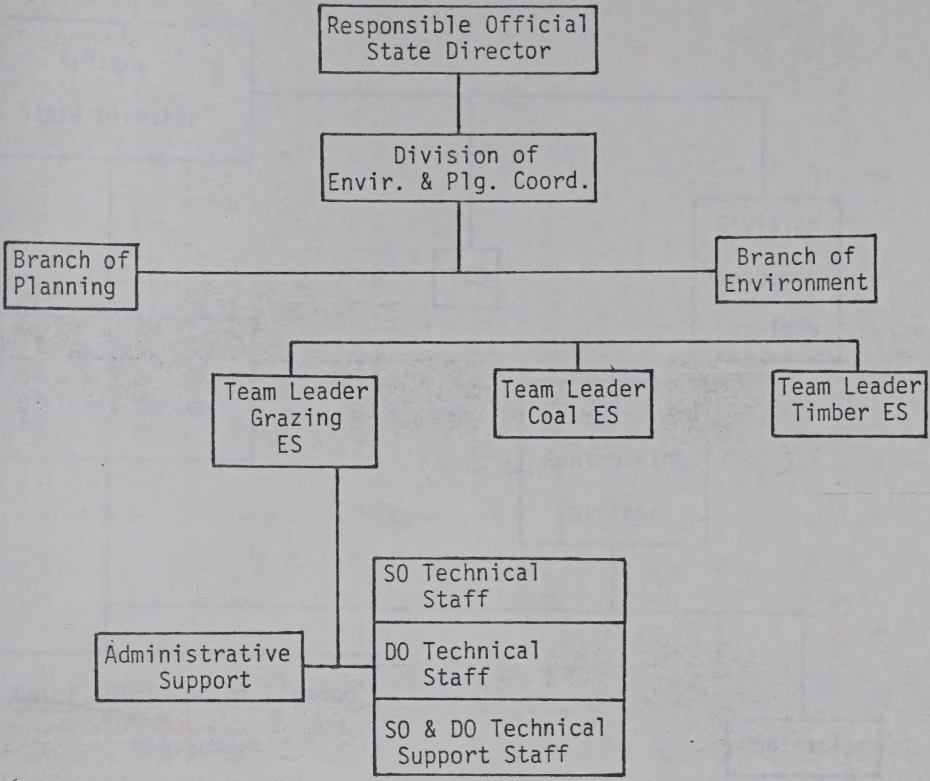
GRAZING ES TIMEFRAME



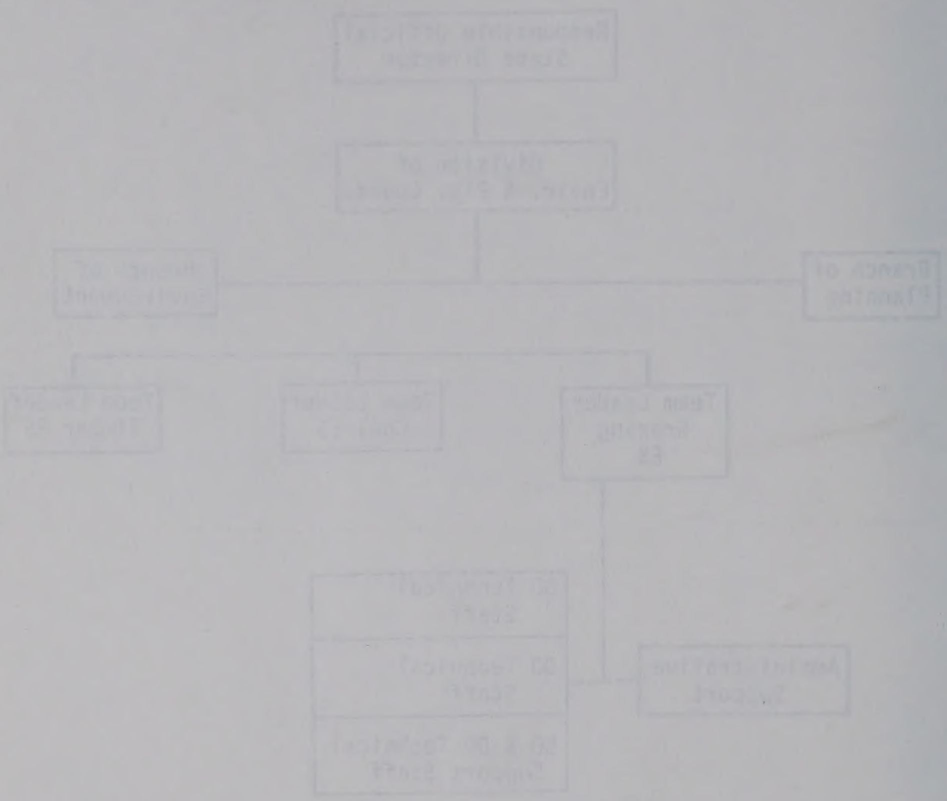
CONCURRENT ES REVIEW PROCEDURE


Team Prepares PDES
PDES
Transmitted
State Office Reviews
Washington Office Reviews
OEPR Reviews
Team SO WO OEPR Meeting
Consolidated Comments Agreed Upon
Team Writes DES

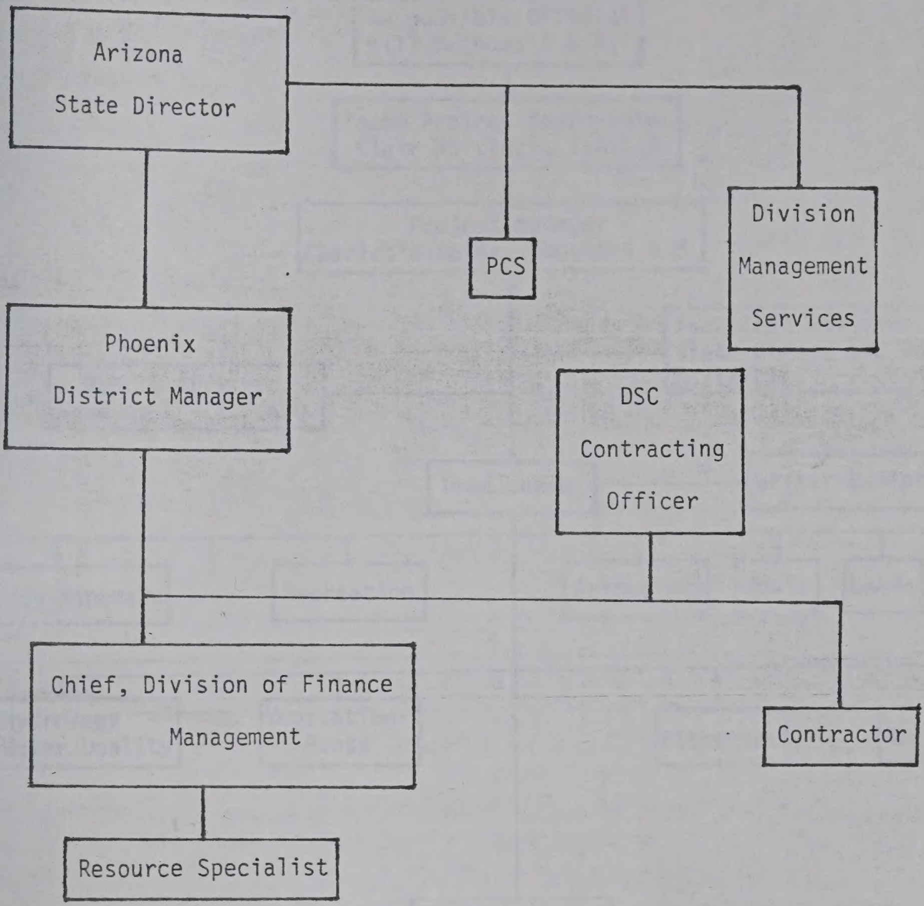
ORGANIZATIONAL STRUCTURE
STATE OFFICE CORE ENVIRONMENTAL TEAMS
(Montana and Oregon)


Responsible Official
State Director
Division of
Envir. & Plg. Coord.
Branch of
Planning
Branch of
Environment
Team Leader
Grazing
ES
Team Leader
Coal ES
Team Leader
Timber ES
SO Technical
Staff
DO Technical
Staff
SO & DO Technical
Support Staff
Administrative
Support

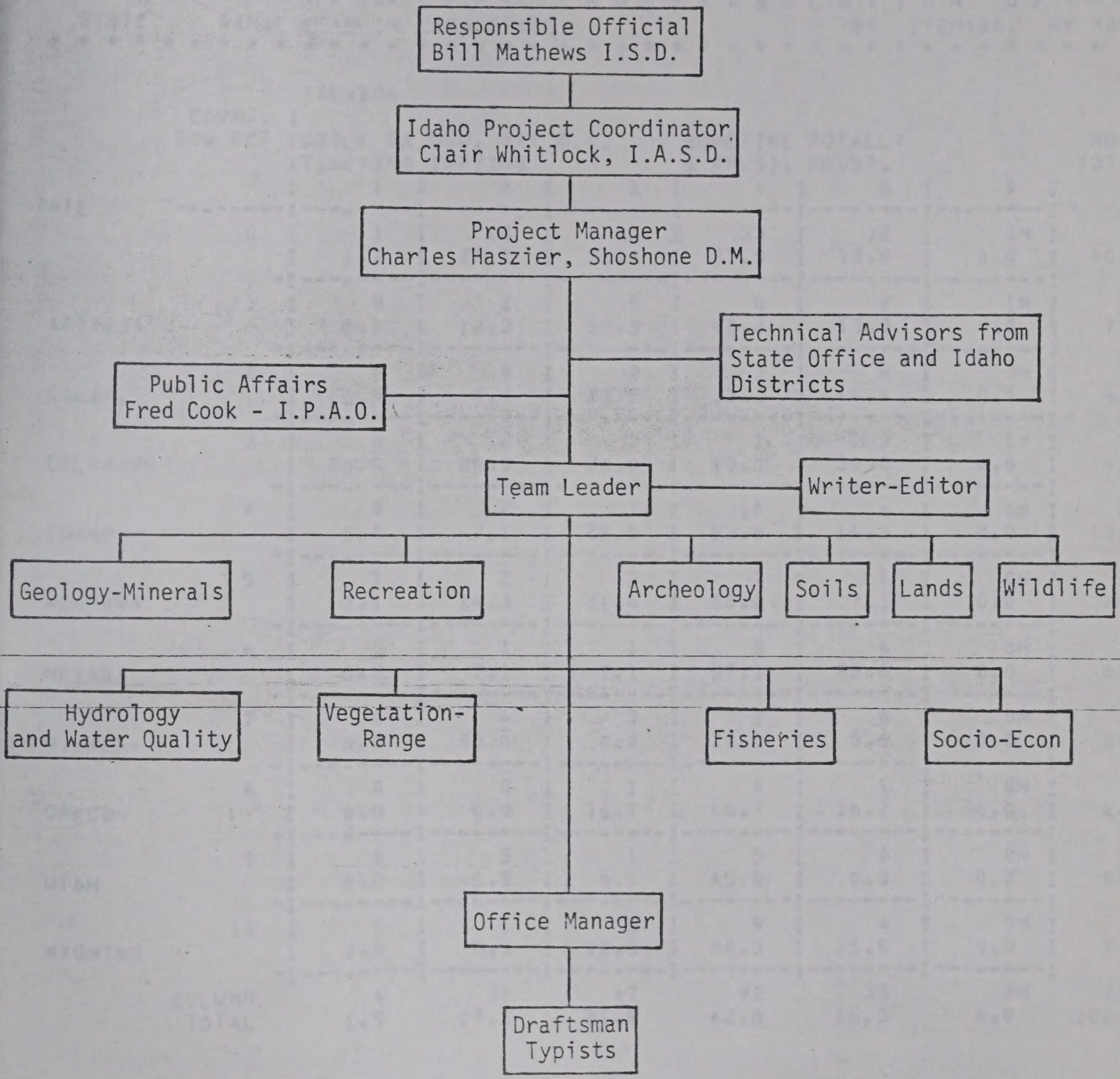
ORGANIZATIONAL STRUCTURE
STATE OFFICE CORE ENVIRONMENTAL TEAMS
(Montana and Oregon)


Responsible Official
State Director
Division of
Environ.& Pln. Coord.
Branch of
Environment
Branch of
Planning
Team Leader
Team Leader
Team Leader
Grazing,
ES
GS Biological
Staff
GS Technical
Staff
GS & WG Technical
Support Staff
Administrative
Support

ORGANIZATIONAL STRUCTURE
CONTRACT OF ENVIRONMENTAL STATEMENT
(Arizona)


Arizona State Director
PCS
Division Management Services
Phoenix District Manager
DSC Contracting Officer
Chief, Division of Finance Management
Contractor
Resource Specialist

ORGANIZATIONAL STRUCTURE
DISTRICT OFFICE ENVIRONMENTAL TEAMS
(Typical of Idaho, Arizona, California, Colorado,
Nevada, New Mexico, Utah, and Wyoming)


Responsible Official
Bill Mathews I.S.D.
Idaho Project Coordinator
Clair Whitlock, I.A.S.D.
Project Manager
Charles Haszier, Shoshone D.M.
Technical Advisors from State Office and Idaho Districts
Public Affairs
Fred Cook - I.P.A.O.
Team Leader
Writer-Editor
Geology-Minerals
Recreation
Archeology
Soils
Lands
Wildlife
Hydrology and Water Quality
Vegetation-Range
Fisheries
Socio-Econ
Office Manager
Draftsman
Typists

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3'    ·GE REVIEW TEAM   CONTACT:  PHIL GILLESPIE 343-6825

 .-E    RANGE    (CREATION DATE = 03/08/79)

 * * * * * * * * * * * * * * * * * * * * * * *  C R O S S T A B U L A T I O N   O F   * *
   STATE     RANGE ES'S IN EACH STATE                                BY  ITEM106    MY RANG
 * * * * * * * * * * * * * * * * * * * * * * * * * * * * * * * * * * * * * * * * * * * * * *

                  ITEM106
            COUNT I
          ROW PCT IGRTLY SA USU. SAT O.K.      SOMETIME TOTALLY                  ROW
                  ITISFYING ISFYING           S FRUST. FRUST.                   TOTAL
                  I     1  I     2  I     3  I     4  I     5  I     0  I
 TATE    --------I--------I--------I--------I--------I--------I--------I
               0  I     1  I    18  I    23  I    33  I    12  I    0M  I     87
                  I   1.1  I  20.7  I  26.4  I  37.9  I  13.8  I   0.0  I   40.5
                 -I--------I--------I--------I--------I--------I--------I
               1  I     0  I     2  I     5  I     6  I     2  I    1M  I     15
  ARIZONA         I   0.0  I  13.3  I  33.3  I  40.0  I  13.3  I   0.0  I    7.0
                 -I--------I--------I--------I--------I--------I--------I
               2  I     0  I     0  I     2  I     3  I     4  I    0M  I      9
  CALIF.          I   0.0  I   0.0  I  22.2  I  33.3  I  44.4  I   0.0  I    4.2
                 -I--------I--------I--------I--------I--------I--------I
               3  I     2  I     2  I     2  I     1  I     3  I    1M  I     10
  COLORADO        I  20.0  I  20.0  I  20.0  I  10.0  I  30.0  I   0.0  I    4.7
                 -I--------I--------I--------I--------I--------I--------I
               4  I     0  I     2  I     7  I    15  I     4  I    0M  I     28
  IDAHO           I   0.0  I   7.1  I  25.0  I  53.6  I  14.3  I   0.0  I   13.0
                 -I--------I--------I--------I--------I--------I--------I
               5  I     1  I     2  I     3  I     7  I     1  I    0M  I     14
  MONTANA         I   7.1  I  14.3  I  21.4  I  50.0  I   7.1  I   0.0  I    6.5
                 -I--------I--------I--------I--------I--------I--------I
               6  I     0  I     1  I     1  I     8  I     4  I    0M  I     14
  NEVADA          I   0.0  I   7.1  I   7.1  I  57.1  I  28.6  I   0.0  I    6.5
                 -I--------I--------I--------I--------I--------I--------I
               7  I     0  I     4  I     0  I     1  I     0  I    0M  I      5
  N. MEX.         I   0.0  I  80.0  I   0.0  I  20.0  I   0.0  I   0.0  I    2.3
                 -I--------I--------I--------I--------I--------I--------I
               8  I     0  I     0  I     1  I     4  I     1  I    0M  I      6
  OREGON          I   0.0  I   0.0  I  16.7  I  66.7  I  16.7  I   0.0  I    2.8
                 -I--------I--------I--------I--------I--------I--------I
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  UTAH            I   0.0  I  45.5  I   9.1  I  45.5  I   0.0  I   0.0  I    5.1
                 -I--------I--------I--------I--------I--------I--------I
              10  I     0  I     1  I     2  I     9  I     4  I    0M  I     16
  WYOMING         I   0.0  I   6.3  I  12.5  I  56.3  I  25.0  I   0.0  I    7.4
                 -I--------I--------I--------I--------I--------I--------I
           COLUMN        4      37      47      92      35      2M       215
            TOTAL      1.9    17.2    21.9    42.8    16.3     0.0     100.0

IUMBER OF MISSING OBSERVATIONS =       2
```

Appendix 7A

Range Environmental Statement

Review Questionnaire

1. How many environmental statements (ESs) have you helped prepare? (Indicate number for each type) [ ] NO RESPONSE

________	Range	________	Timber
________	Coal	________	Pipeline R/W
________	OCS	________	Other (Specify) ________

2. Did you expect assignment to an ES team when you took a job with BLM? 23.0% YES, definitely; 19.0% YES, possibly; 58% NO; [ ] NO RESPONSE

3. What was your employment status before assignment to an ES Team? 76.2% Full-Time Permanent; 4.8% Temporary; 11.9% WAE; 7.1% Other.

4. What was the Total length of time you were/are involved with an ES Team?

Involvement:	Most Recent ES		Previous ES
	4.5%	Less than 1 month	3.6%
	24.9%	1-3 months	26.8%
	32.8%	7-12 months	23.2%
	37.8%	More than 1 year	46.4%

Degree of Involvement:	53.5%	Full Time	48.5%
	20.8%	Part Time (Continuous)	26.3%
	25.7%	Part Time (Intermittent)	25.2%

5. Did you prepare Planning documents that served as a basis for the ES to which you were (are) assigned? YES; 53.2% NO; 46.3%
34.0% Inventory; 37.3% URA; 35.0% MFP; 22.1% AMP; 8.8% Other ________

6. Describe your most recent range ES involvement by checking the areas in which you participated (are participating): (40 hours or more)
26.0% PREPARATION PLAN; 50.0% PROPOSED ACTION; 69.0% IMPACT ANALYSIS; 68.0% DESCRIPTION OF ENVIRONMENT; 65.0% ALTERNATIVES; 28.0% PUBLIC INVOLVEMENT; 26.0% OTHER (Specify)

7. In what ways is your most recent involvement in ES different from other ESs/or Planning experience?

a. Organization of Team	39.8%	Better	44.4%	Same	15.8%	Worse
b. Guidance and Direction	25.7%	Better	38.0%	Same	36.3%	Worse
c. Information and Data	29.7%	Better	39.0%	Same	3.14%	Worse

d.	Working Conditions	27.5% Better	50.9% Same	21.6% Worse
e.	Management Attitudes	23.3% Better	47.1% Same	29.7% Worse
f.	Employee Attitudes	27.4% Better	36.0% Same	36.6% Worse

8. When you were first assigned to a grazing ES team, did you expect:

	Expected			Did You Get It?		
	YES	PARTIAL	NO	YES	PARTIAL	NO
a. Complete inventory data?	42.4	35.0	22.7%	19.2	39.0	40.9%
b. Complete planning documents?	63.3	23.1	13.6%	31.6	35.7	32.7%
c. Time in the field?	37.3	33.3	29.4%	31.8	28.8	39.4%
d. Mostly "desk work"?	71.5	25.5	3.0%	83.2	14.7	2.0%
e. Detailed guidance on ES content, procedures, and format?	75.7	16.8	7.4%	20.5	41.5	38.0%
f. Formal training for ES preparation duties?	47.0	23.3	29.7%	20.7	30.3	49.0%
g. Assignment only to tasks for which you were specifically trained?	52.5	22.7	24.7%	38.7	33.5	27.8%
h. Support from other team members well-trained in their areas of responsibility?	82.2	17.3	.5%	58.0	36.0	6.0%
i. Adequate clerical/administrative resources (support staff, space, materials, etc.)?	82.0	15.0	3.0%	55.6	33.3	11.1%
j. Sufficient time for ES team to complete task without sacrificing quality?	57.9	20.3	21.8%	12.0	28.5	59.5%
k. Full time assignment to ES team?	56.7	11.9	31.3	58.6	15.7	25.8%
l. Normal working hours?	51.2	24.9	23.9%	32.5	26.9	40.6%
m. Compensation for overtime?	55.9	11.4	32.7%	53.8	11.6	34.7%
n. Other rewards (temporary promotion, pay increase career enhancement, etc.)?	31.5	18.7	49.8%	21.3	16.2	62.4%
o. High priority for ES by management?	81.8	14.3	3.9%	53.3	32.2	14.6%
p. Anything else? (Specify)	66.7	0	33.3%	23.3	10.0	66.7%

9. Was (is) your ES team located where BLM management (AM, DM, SD) had daily access to team members or their work product?
70.8% YES; 22.0% NO; 7.2% NO RESPONSE.

10. What, if any, skills which were (are) necessary but lacking on range ES team(s) on which you have been (are) a member:

a. 53.3% All necessary skills were available.
b. 46.7% Following skills were/are lacking:
Only socio-economic skills mentioned
with any frequency.

11. What has been (is) your experience of Management Support for Grazing ES preparation relative to:

	TEAM MGMT			DO MGMT			SO MGMT			DEPT MGMT		
	Hi	Med	Lo	Hi	Med	Lo	Hi	Med	Lo	Hi	Med	Lo
a. Technical Assistance Availability	48.4	42.6	9.0	35.6	41.2	23.2	19.9	48.2	31.9	12.9	31.6	55.
b. Program Priority or Emphasis	85.6	12.3	2.1	56.8	26.0	17.2	52.0	34.8	13.2	48.7	30.1	21.
c. Professional Judgment Support or Acceptance of Professional Judgment	61.5	29.9	8.6	43.4	37.6	19.0	26.2	44.4	29.4	13.9	39.2	47.
d. Consideration of Personal Needs	58.4	27.0	14.6	37.0	32.0	31.0	15.5	42.0	42.5	6.8	35.8	57.

12. Which level of review requested the most changes be made?

	Total Rewrite	Major Changes	Minor Changes	Editorial Changes	None
Team Mgmt.	5.1	22.3	56.7	14.0	1.9
District Office	.7	19.0	51.0	11.1	18.3
State Office	8.2	38.0	41.8	7.0	5.1
WO (260)	16.8	49.7	27.5	3.4	2.7
WO (330)	14.1	50.7	28.2	2.1	4.9
Department (OEPR)	16.1	46.8	27.4	4.0	5.6
The Public	5.1	28.3	46.5	1.0	19.2
Other (Specify):	44.8	17.2	27.6	0	10.3

Optional Comments: ______________________________

13. Were the requested changes mostly valid, resulting in a higher quality ES?

	Most Recent ES		
	YES	DON'T KNOW	NO
Team Management	83.7%	9.3%	7.0%
District Office	60.9%	21.1%	18.0%
State Office	51.7%	24.1%	24.1%

(Continued on next page)

	Most Recent ES		
	YES	DON'T KNOW	NO
WO (260)	37.0%	34.0%	29.0%
WO (330)	38.9%	37.6%	23.6%
Department (OEPR)	34.2%	32.9%	32.9%
The Public	34.9%	38.7%	25.5%
Other (Specify)			
Comment:	81.1%	8.1%	5.4%

14. Do you believe the grazing ES(s) you have worked (are working) on will prove of significant value for BLM resource management?
25.9% YES; 43.1% POSSIBLY; 19.4% DOUBTFUL; 10.6% NO

15. Generally, I would describe most of my Range ES experience to be:
1.9% Greatly Satisfying 17.2% Usually Satisfying 21.9% O.K. 42.8% Sometimes Frustrating 16.3% Totally Frustrating

16. In your opinion, are there alternative ways that BLM could prepare Grazing ESs in a more expedient manner?

	YES	NO	POSSIBLY
a. Components Contracted Out	23.7%	40.0%	36.3%
b. Total ES Contracted Out	11.2%	69.0%	19.8%
c. Permanent ES Teams	34.9%	37.1%	28.0%
d. Permanent ES/Planning Core Staff	51.4%	18.9%	29.1%
e. Other (Specify)	86.8%	13.2%	

17. What are the most effective aspects of BLM's Range ES (Preparation) program?

- Led to improvements in analysis of management decisions.
- Led to recognition for more accurate and adequate inventory data.
- Small but significant number stated that there were none.

18. What aspects of BLM's Range ES (Preparation) program act as "Bottlenecks"?

- Technical problems; focused primarily on lack of inventory data.
- Management problems; focused primarily on proposed actions that were changed and the multiplicity of reviews.

19. In your opinion, what areas of range ES preparation could be more effectively managed?

Comments were 99% critical and pointed to the following:

- Data: specify data format and the extent of needed data.
- Proposed Action: management must provide firm, well-defined PA.
- Review: Consolidate multiple reviews and eliminate contradictions.
- Format: Provide standardized format and "boiler-plate" repetitions.
- Personnel: more salary, career incentives for full-time volunteers.
- Management: more direct involvement in planning, preparation and review and greater support of ES decisions.

20. In regard to range ESs, are there any unnecessary or redundant activities that could be eliminated? 74.4% NO 25.3% YES
If YES, specify -

Majority, while acknowledging that various processes and steps were necessary, and often helpful, nevertheless commented about:

- changing guidelines, procedures and policies.
- multiple and conflicting review levels and procedures.
- resource inventory data that was inadequate, unaccurate or unuseable.

21. In your opinion, is any additional consideration needed for personal hardships of ES team members? 28.8% NO 70.5% YES
If YES, specify -

Responses to this question were the most numerous and most detailed and were primarily negative relative to:

- overtime work and time away from home. (Two of three comments.)
- need for grade increases (temporary) and other incentives. (One of two comments.)
- conflicts between "regular" job demands and ES team demands.

Profile of a BLM Employee
Assigned to an ES Team

A BLM employee involved in the range ES program is one who described himself as "frustrated." This employee meets the following average profile:

- Is a GS 9-12 who did not expect to be assigned to an ES team.
- Is a permanent employee, assigned to the ES on a full-time basis for more than 6 months.
- Considers ES team colleques qualified and dedicated.
- Is assigned to the ES team to describe the environment, analyze impacts on the environment, develop alternatives; helped with the preparation plan and proposed action.
- Considers reviewers of ES's unreasonable and unqualified.
- Receives inadequate data from inventory and planning documents.
- Spends less time in the field and more time at the desk than expected.
- Receives less specific guidance and training than expected.
- Works in areas of specialization as well as others.
- Receives inadequate time to do quality work.
- Believes normal working hours possible with better management.
- Receives overtime compensation but rarely receives other rewards.
- Finds the ES program to have a lower priority than expected.
- Finds significant decreases in management support for professional judgment at SO and WO levels.
- Doubts that ES will be valuable in resource management.
- Wants no further ES assignments.

The above profile was drawn from questionnaires received as a part of the range ES review effort. Additionally, respondents often enclosed written comments describing a wide variety of personal hardships, lack of job satisfaction and allegations of bad management.

Appendix 9A

GRAZING ENVIRONMENTAL STATEMENT CHRONOLOGY OF EVENTS

4/22/71 - Decision to write programmatic ES for Range.

3/21/73 - Preliminary working draft of Programmatic ES completed and circulated to representative groups.

10/30/73 - Natural Resources Defense Council filed suit in U.S. District Court for the District of Columbia to require site specific EIS's be prepared for the grazing program.

4/11/74 - Draft Programmatic EIS to CEQ.

5/31/74 - Oral arguments on NRDC suit presented to court.

12/30/74 - Judgment by Judge Flannery, U.S. District Court for D.C., granting NRDC motion. Allowed 30 days for parties to agree on schedule for preparation of EIS's.

1 / 75 - Programmatic ES Released - Final.

4/11/75 - Agreement on schedule signed by both parties.

5/2/75 - Pacific Legal Foundation and Public Lands Council appealed the 12/30/74 judgment.

6/18/75 - Court approved agreement on schedule for preparation of ES's.

1/16/76 - Pacific Legal Foundation and Public Lands Council appeal denied. District Court judgment affirmed.

4/2/76 - Request to District Court for deviation from scheduled preparation of EIS - Extend completion of Challis ES from 6/30/76 to 10/8/76.

4/13/76 - Pacific Legal Foundation and Public Lands Council petitioned Supreme Court for review of 1/16/76 decision.

5/18/76 - District Court approved request for deviation filed 4/2/76.

6/30/76 - Supreme Court denied petition of 4/13/76.

9/10/76 - An additional request to extend the Challis ES to January 10 is being prepared. This is necessary due to the large number of comments received and the need to reanalyze data on other possible alternatives suggested in the replies to the first draft.

1/10/77 - Challis Final ES filed-decision to prepare supplement.

9/1/77 - Notice of proposed deviation from schedule of 6/18/75.

4/14/78 - Amended Final Judgment - directed schedule for '78 -'79. Specified acreage for '80-'82 - Challis to be done 1978.

5/12/78 - San Luis and Rio Puerco FES filed.

7/14/78 - Uncompahgre FES filed.

9/11/78 - Plan for preparation of ES - '80-'82.

9/12/78 - Notice of proposed deviation in schedule for Challis to 11/30/78.

9/21/78 - Cebat-Black Mountain FES filed.

9/27/78 - Hot Desert FES filed.

9/28/78 - Sandy FES filed.

9/29/78 - San Simon FES filed.

10/4/78 - Tuledad-Home Camp FES filed.

12/1/78 - Challis supplemental filed.

1/31/79 - Seven Lakes FES filed.

4/30/79 - Draft Grazing ES review report completed.

5/10/79 - Draft guidelines for preparaing interim strategy grazing ES's.

6/11/79 - Secretary issued decisions on Department procedures for implementation of NEPA.

7/30/79 - CEQ guidelines become effective.

CHAPTER VI
REVIEW COMMENTS

A. General Comments

On June 11, 1979, Secretary Andrus delegated authority for ES approval to the responsible program Assistant Secretaries and were given approval to further delegate that authority. At the time of this writing, the mechanism to delegate this authority has not been worked out, however, it is anticipated that it is forthcoming in the very near future. Once the Director has authority to approve environmental statements, it will be further delegated to the State Directors that demonstrate their ability to prepare statements that adequately comply with NEPA, CEQ, Departmental and Bureau guidelines. Approval delegation will simplify the ES review process which will both expedite the process and make it more efficient. The concurrent review process will have little validity once the approval is delegated, but will still provide a concept that should be utilized on a smaller scale at the State level.

State comments suggesting that the review report be changed in those areas that are no longer valid, such as initiating action to ensure that the 1979 schedule will be met, was not done since the analysis and recommendations that refer to these areas clearly document problem areas that should be avoided in the future.

B. Summary of State Office Review Comments

In June of 1979, the State Directors were requested to comment on the draft Grazing Environmental Statement Review Report. These comments have been summarized and categorized into the areas that were reviewed in the report as follows:

1. Schedule

- Using old CEQ guidelines is not necessary since there appears to be little difficulty in meeting time frames by using the new regulations.

- The recommendation not to accelerate the grazing ES schedule does not affect Colorado since their statements are scheduled to be completed in 1985.

2. Strategy

- All states supported the recommendation not to change the current procedures for vegetation allocation.

- The vegetation allocation procedure should be used as the long range strategy rather than the RMP.

- Those states that felt there is an opportunity to combine ES areas suggested that this approach be pursued. Those states that have future grazing ES areas on resource area boundaries, did not recommend combining ES's or changing boundaries.

3. Inventory

- Remote sensing may be used as a tool to improve inventory efficiency, but should be slowly integrated into the process.

- Suggest that more emphasis be placed on contracting inventory since it has the greatest possibility for reducing impacts on personnel and funds.

- BLM should reevaluate the need for additional inventory data and proceed with planning and preparing ES's based on existing data.

- Conducting inventory 3-1/2 to 4 years in advance of the ES completion date is not adequate to meet the needs in Nevada due to the size of their resource area. A more realistic advanced time would be 4-1/2 to 5 years.

4. Planning

- The RMP process does not necessarily have to include everything required by the court order. The court order includes a mixture of requirements, land use allocation decisions and detailed management decisions. Two levels of planning are probably more appropriate rather than attempting to answer all policy, land use management and development decisions in one level (RMP) of planning.

- ADP may not be helpful in grazing ES process because experience indicates that it will not be operative until after the ES schedule has been completed.

- Recommend establishing permanent ES core teams rather than establishing ad hoc teams.

- ES review at the Washington level has been used to communicate W.O. guidance and changes to the ES process. The review process should be improved and review roles defined.

- ES teams do not need to be located in the immediate area being analyzed and may be more desirable to be located near state government offices and well equipped libraries.

- Need to determine if W.O./DOI ES reviews are necessary.

- Agreement that delegation of ES approval to SD should be accelerated.

- Recommend that an altered ES team structure made up of 5 members be used in place of the larger team structures.

6. Management

- The report did not address accountability versus authority and suggest that the SO accountability be reaffirmed and then clearly define responsibilities.

- Need to better integrate program priorities so that all are not considered number one.

- The report's recommendations will not solve morale problems.

- The report did not address the lack of career benefits in recommendations.

- Recommend that the PMCS method be used to track the ES program.

7. Contracting

- States were generally not in favor of contracting grazing statements. They did feel, however, that it should be explored and used where appropriate.

- Need to delegate more contracting responsibility to the States.

- Training the DSC contracting staff to assist states in contracting ES's would provide for a centralized contracting assistance staff.

- Develop capability to hire appropriate staff and acquire needed space to complete grazing ES's in-house.

- Study needs to analyze in-house methods of solving ES problems rather than contracting.

8. Other

- The review questionnaire should have included input from line management rather than being slanted toward staffs and technicians.

- Study should have analyzed all other ES efforts such as coal, NBEI, etc.

- The grazing ES review is directed toward solving policy and guidance problems which are not applicable to solving problems at the ES team level.

Delete those recommendations that are not longer applicable.